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*Jane Roe 8 and Joana Diaz*

**UNITED STATES DISTRICT COURT**  
**CENTRAL DISTRICT OF CALIFORNIA**

JANE ROE 8, an individual; and  
JOANA DIAZ, an individual,

Plaintiffs,

v.

INTERNATIONAL CHURCHES OF  
CHRIST, INC., a California nonprofit  
corporation; THE INTERNATIONAL  
CHRISTIAN CHURCH, INC., a  
California nonprofit corporation; HOPE  
WORLDWIDE, LTD., a Delaware  
nonprofit corporation; THOMAS  
("KIP") McKEAN, an individual; THE  
ESTATE OF CHARLES "CHUCK"  
LUCAS; AL BAIRD, an individual;  
STEVE GANSERT-MORICI, an  
individual; JACQUELINE GANSERT-

Case No. 2:23-cv-01192

**COMPLAINT FOR:**

- 1. SEXUAL ASSAULT OF A MINOR**
- 2. VIOLATION OF PENAL CODE 647.6(A)(1)**
- 3. INTENTIONAL INFLICTION OF EMOTIONAL DISTRESS**
- 4. NEGLIGENT HIRING, SUPERVISION, AND RETENTION**
- 5. NEGLIGENT SUPERVISION OF A MINOR**
- 6. FAILURE TO REPORT SUSPECTED CHILD ABUSE IN VIOLATION OF PENAL CODE SECTION 11165. ET SEQ. BASED ON VICARIOUS**

1 MORICI, an individual; BRUCE  
2 WILLIAMS, an individual; ROBIN  
3 WILLIAMS, an individual; ALFREDO  
4 ALANIS, an individual; and DOES 1  
through 100, inclusive,

5 Defendants.

- LIABILITY**  
**7. NEGLIGENCE**  
**8. VIOLATION OF FEDERAL  
RACKETEER INFLUENCED  
AND CORRUPT  
ORGANIZATION (“RICO”)  
ACT 18 U.S.C. § 1962(C)**  
**9. SEXUAL BATTERY IN  
VIOLATION OF CAL. CIV.  
CODE § 1708.5**  
**10. GENDER VIOLENCE IN  
VIOLATION OF CAL. CIV.  
CODE § 52.4**

**JURY TRIAL DEMANDED**

1 Plaintiff JANE ROE 8 and JOANA DIAZ (collectively, “Plaintiffs”) hereby  
2 submit this Complaint pursuant 18 U.S.C. §§ 1961 *et. seq.*, the California Civil Code  
3 and the California Penal Code, under federal question and supplemental jurisdiction  
4 against Defendants INTERNATIONAL CHURCHES OF CHRIST, INC., THE  
5 INTERNATIONAL CHRISTIAN CHURCH, INC., HOPE WORLDWIDE, LTD.,  
6 THOMAS “KIP” McKEAN, THE ESTATE OF CHARLES “CHUCK” LUCAS, AL  
7 BAIRD, STEVE GANSERT-MORICI, JACQUELINE GANSERT-MORICI, BRUCE  
8 WILLIAMS, ROBIN WILLIAMS, ALFREDO ALANIS and all other named and  
9 unnamed defendants (collectively, “Defendants”) and states as follows:

### 10 **INTRODUCTION**

11 1. This action to recover damages on behalf of adult victims of childhood  
12 sexual assault is governed by Code of Civil Procedure section 340.01 (“section  
13 340.01”).

14 2. The incidents of childhood sexual assault against Plaintiffs alleged herein  
15 were facilitated and actively concealed by Defendants while Plaintiffs were minors.

16 3. This case involves an **inhumane abuse enterprise of epic proportions**  
17 that has been perpetrated and actively concealed by a **ruthless den of sexual predators**  
18 wherein, through systemic physical force and psychological manipulation, **women and**  
19 **children as young as 3 years old were repeatedly raped and sexually abused with**  
20 **impunity by trusted church members.**

### 21 **JURISDICTION AND VENUE**

22 4. This Court has federal subject matter jurisdiction over this action pursuant  
23 to 28 U.S.C. § 1331 because it arises under the Racketeer Influenced and Corrupt  
24 Organizations Act (18 U.S.C. §§ 1961 *et. seq.*).

25 5. Pursuant to Code of Civil Procedure §340.1(q) as amended by Assembly  
26 Bill 218, effective January 1, 2020, there is a three (3) year window in which all civil  
27 claims of childhood sexual assault are revived if they have not been litigated to finality.  
28 This provision provides that, "[n]otwithstanding any other provision of law, any claim

1 for damages described in paragraphs (1) through (3), inclusive, of subdivision (a) that  
2 has not been litigated to finality and that would otherwise be barred as of January 1,  
3 2020, because the applicable statute of limitations, claim presentation deadline, or any  
4 other time limit had expired, is revived, and these claims may be commenced within  
5 three years of January 1, 2020. A plaintiff shall have the later of the three-year time  
6 period under this subdivision or the time period under subdivision (a) as amended by  
7 the act that added this subdivision." This claim has not been previously litigated to  
8 finality; thus, it is timely under the revised provisions of Code of Civil Procedure  
9 §340.1(q).

10 6. This Court has supplemental jurisdiction over all asserted state law claims  
11 pursuant to 28 U.S.C. § 1367 because all state law claims are so related to, and arise  
12 from, the same common nucleus of operative facts from which the federal claims arise  
13 and, therefore, they form part of the same case or controversy under Article III of the  
14 United States Constitution.

15 7. Venue is proper in this Court pursuant to 28 U.S.C. § 1391(a) because a  
16 substantial part of the events and omissions giving rise to the claims occurred in this  
17 District. Additionally, the “nerve centers” of the International Churches of Christ, Inc.,  
18 and The International Christian Church, Inc. are both within the jurisdictional  
19 boundaries of the Central District of California.

## 20 **THE PARTIES**

### 21 **A. PLAINTIFFS**

22 8. Plaintiff Jane Roe 8 is a 29-year-old female citizen and resident of Los  
23 Angeles, California. Jane Roe 8 was a minor, citizen of the United States of America,  
24 and resident of California when she first became a victim and survivor of Defendants’  
25 sexual abuse and trafficking.

26 9. Plaintiff Joana Diaz is a 29-year-old female citizen and resident of  
27 Moreno Valley, California. Joana Diaz was a minor, citizen of the United States of  
28 America, and resident of California when she first became a victim and survivor of

1 Defendants' sexual abuse and trafficking.

2 **B. DEFENDANTS**

3 10. Defendant International Churches of Christ, Inc. (the "ICOC") is a  
4 religious non-profit corporation organized and existing under and by virtue of the laws  
5 of the State of California. The ICOC purposefully conducts substantial religious and  
6 affiliated programs and activities in the County of Los Angeles, State of California.  
7 The ICOC has ecclesiastical, governmental, and administrative authority over the  
8 business and conduct of all locations worldwide. This authority includes, but is not  
9 limited to, the selection of ministers, the direction of liturgical interpretation, the  
10 collection of tithings and additional funds, and the issuance of behavioral and  
11 commercial directives for members, ICOC churches and ICOC affiliate churches  
12 worldwide.

13 11. Defendant The International Christian Church, Inc. ("ICC") is a religious  
14 non-profit corporation organized and existing under and by virtue of the laws of the  
15 State of California. ICC purposefully conducts substantial religious and affiliated  
16 programs and activities in the County of Los Angeles, State of California. ICC has  
17 ecclesiastical, governmental, and administrative authority over the business and  
18 conduct of all locations worldwide. This authority includes, but is not limited to, the  
19 selection of ministers, the direction of liturgical interpretation, the collection of tithings  
20 and additional funds, and the issuance of behavioral and commercial directives for  
21 members worldwide.

22 12. Defendant HOPE worldwide ("HOPE") was founded in 1994 by the  
23 ICOC and is a religious non-profit corporation organized and existing under and by  
24 virtue of the laws of the State of Delaware, with a principal place of business registered  
25 with the Secretary of State for the State of California located at 9449 Balboa Ave. Ste.  
26 311, San Diego, California 92117. HOPE purposefully conducts substantial religious  
27 and affiliated programs and activities in the County of Los Angeles, State of California.  
28 HOPE operates at the specific direction and control of ICOC.

1           13. Defendant Thomas “Kip” McKean (“Kip” or “McKean”), upon  
2 information and belief, is a United States citizen, currently residing in Pacific  
3 Palisades, California. At all times relevant to the events that form the basis of this  
4 Complaint, Defendant Kip was a member of ICOC’s Los Angeles regional branch, and  
5 later, the City of Angels International Church of Christ in Los Angeles, California.  
6 Defendant Kip resided in California for extended periods while conducting business in  
7 California on behalf of Defendant ICOC and Defendant ICC. Defendant Kip’s  
8 supervision, direction, and control over Defendants forms the basis of his personal  
9 liability.

10           14. Defendant The Estate of Charles “Chuck” Lucas (“Chuck” or “Lucas”),  
11 upon information and belief, was a citizen of the United States of America and was  
12 residing, at the time of his death, in Thomasville, Georgia. At all times relevant to the  
13 events that form the basis of this Complaint, Defendant Chuck was a member of the  
14 ICOC, and later, formed another church called Cornerstone. Defendant Chuck resided  
15 in Georgia for extended periods while conducting business in California on behalf of  
16 Defendant ICOC. Defendant Chuck’s supervision, direction, and control over the  
17 Defendants forms the basis of his personal liability.

18           15. Defendant Al Baird (“Baird”) upon information and belief, is a United  
19 States citizen, currently residing in the Los Angeles metro area in California. At all  
20 times relevant to the events that form the basis of this Complaint, Baird is a member  
21 and Lead Elder of ICOC’s Los Angeles branch, which directs and controls the activities  
22 of all other ICOC branches, including but not limited to North River ICOC. Baird’s  
23 supervision, direction, and control over Defendants forms the basis of his personal  
24 liability.

25           16. Defendant Steve Gansert-Morici upon information and belief, is a United  
26 States citizen, currently residing in Manhattan Beach, California. At all times relevant  
27 to the events that form the basis of this Complaint, Steve Gansert-Morici was a leader  
28 of the East Region Los Angeles ICOC. Steve Gansert-Morici’s active concealment of

1 Jane Roe 8's abuse, along with his supervision, direction, and control over Defendants  
2 forms the basis of her personal liability. Steve Gansert-Morici is currently a lead  
3 evangelist with the South Bay ICOC.

4 17. Defendant Jacqueline Gansert-Morici upon information and belief, is a  
5 United States citizen, currently residing in Manhattan Beach, California. She is the  
6 wife of Defendant Steve Gansert-Morici. At all times relevant to the events that form  
7 the basis of this Complaint, Jacqueline Gansert-Morici was a leader of the East Region  
8 Los Angeles ICOC. Jacqueline Gansert-Morici's active concealment of Jane Roe 8's  
9 abuse, along with her supervision, direction, and control over Defendants forms the  
10 basis of her personal liability. Jacqueline Gansert-Morici is currently a lead evangelist  
11 with the South Bay ICOC.

12 18. Defendant Bruce Williams upon information and belief, is a United States  
13 citizen, currently residing in Denver, Colorado. At all times relevant to the events that  
14 form the basis of this Complaint, Bruce Williams was an overseeing Elder of the East  
15 Region Los Angeles ICOC. Bruce Williams's active concealment of Jane Roe 8's  
16 abuse, along with his supervision, direction, and control over Defendants forms the  
17 basis of his personal liability. On information and belief, Bruce Williams is retired but  
18 still retains a paid role with ICOC.

19 19. Defendant Robin Williams upon information and belief, is a United States  
20 citizen, currently residing in Denver, Colorado. She is the wife of Defendant Bruce  
21 Williams. At all times relevant to the events that form the basis of this Complaint,  
22 Robin Williams was an overseeing Elder of the East Region Los Angeles ICOC. Robin  
23 Williams's active concealment of Jane Roe 8's abuse, along with her supervision,  
24 direction, and control over Defendants forms the basis of her personal liability.

25 20. Defendant Alfredo Alanis upon information and belief, is a United States  
26 citizen, currently residing in Portland, Oregon. At all times relevant to the events that  
27 form the basis of this Complaint, Alfredo Alanis was a leader of the Los Angeles and  
28 Portland ICOC locations. Alfredo Alanis's active concealment of Joana Diaz's abuse,



1 along with his supervision, direction, and control over Defendants forms the basis of  
2 his personal liability.

3 21. Plaintiffs are ignorant of the true names of the defendants sued herein as  
4 Does 1-100, inclusive, and therefore sue these defendants by such fictitious names.  
5 Plaintiffs will amend the Complaint to allege their true names when ascertained.  
6 Plaintiffs allege that, at all relevant times herein, Does 1-100 were the co-conspirators,  
7 subsidiaries, employees, employers, and agents of constituent members of Defendants  
8 herein. Plaintiffs allege that each of the fictitiously named defendants is legally  
9 responsible for the actions forming the basis of this Complaint and that Plaintiffs' losses  
10 and damages are the result of their wrongful conduct.

11 **GENERAL ALLEGATIONS**  
12 **INTRODUCTION TO DEFENDANTS' METICULOUSLY CRAFTED,**  
13 **HEINOUS ABUSE ENTERPRISE**

14 22. Defendants, at the direction and control of McKean and Lucas, have  
15 collectively exploited everything good and noble in their trusting and loyal members  
16 by callously robbing them of their childhood innocence through **psychological**  
17 **coercion and manipulation; pervasive sexual abuse of children as young as 3 years**  
18 **old; and shameful financial abuse.** Each of the foregoing abuses were actively  
19 concealed by Defendants to avert discovery by child protective services and the police.

20 23. Founded in 1993, ICOC has become an intricate and intentionally  
21 confusing "network of over 700 non-denominational churches in about 150 countries."  
22 Throughout its history, ICOC has gone by other names, such as: the Boston Movement,  
23 the Discipling Movement, the Crossroads Movement, and Multiplying Ministries, for  
24 example. Often, the city in which a local assembly is located is added to the name, for  
25 example, Milwaukee Church of Christ and Sarajevo Church of Christ."

26 24. To ensure Defendants' exploitative conduct remains unchecked,  
27 Defendants have utilized their vast resources to **silence any internal dissidents**  
28 **through threats, back room dealings and defamation,** and if necessary, vexatious



1 litigation.

2 25. Defendants have created a “David and Goliath” scenario, where the few  
3 members that have spoken up over the last four decades, have been swiftly suppressed.  
4 Defendants have intentionally created a system of exploitation that extracts any and all  
5 value it can from members and non-members while shielding their illicit conduct from  
6 discovery by outsiders.

7 26. Defendants coerced parents/members to remain silent regarding the  
8 abuses their children suffered through payoffs and non-disclosure agreements. It is the  
9 vast financial base that has insulated Defendants from exposure, and provides  
10 legitimacy and license to Defendants’ shameful system of exploitation and abuse. The  
11 **communal ostracization and isolation from the outside world has caused highly**  
12 **debilitating emotional and mental harm, and in some cases, suicide.**

13 27. Defendants operate with a strict and documented **discipleship pyramid**,  
14 where every member has an elder disciple member “over them” that acts as a mentor  
15 and jailor. This carefully crafted infrastructure enables both churches to execute and  
16 maintain a **micromanaged degree of control over every aspect of each member’s**  
17 **life.** Members are systematically deindividualized, only to endure communal isolation  
18 from the world at large.

19 28. Only “disciplers” were allowed to provide any counseling to church  
20 members, however, they were not licensed counselors or mental health practitioners.  
21 Abuses were reported to the “disciplers”, however, no investigations were initiated and  
22 no reports were made to the police by Defendants, and each of them.

23 29. Defendants created a religious requirement that mandated victims to  
24 confess “sins” on a daily basis, however, “disciplers” would share the specifics of these  
25 “sins” with other groups and leaders in a juvenile gossip-like culture that permeated  
26 the church. This allowed Defendants to use Plaintiffs’ abuses as emotional blackmail  
27 within the community.

28 ///

1           30. In addition to the “discipler” structure, Defendants were/are characterized  
 2 by **indoctrination of rigid fundamentalist teachings, unyielding compliance with**  
 3 **instruction and strict social separatism**. Every new member undergoes a rigid  
 4 conversion process that is tantamount to **systemic brainwashing**, called the “First  
 5 Principles” and once a new member agrees to all indoctrination related teachings, they  
 6 must be baptized in water and completely devote their life to the church.

7           31. Defendants taught their members that only fellow church members are  
 8 “true disciples” of Jesus who will be rewarded with a place in heaven in the afterlife;  
 9 non-members will not go to heaven and are not “true disciples” of Jesus. Indeed, this  
 10 **insider-outsider dichotomy** allowed scores of sexual predators within the churches to  
 11 abuse children without fear of criminal prosecution. Defendants created a **highly**  
 12 **exclusive environment for its members** wherein they were/are prohibited from  
 13 marrying anyone outside the church and the church must approve all marriages, which  
 14 ultimately gives the church an incredible degree of control over every aspect of  
 15 members’ lives.

16           32. Moreover, Defendants indoctrinated their parishioners to forgive any  
 17 slight, no matter how severe, and “move on” without reporting such abuses. Defendants  
 18 teach/taught that because “no one is free from sin,” judging the conduct of another, no  
 19 matter how villainous, is beyond the right of any individual. Further, **parishioners**  
 20 **must protect God’s church and modern-day movement from all challenges**.

21 **THE CHURCHES’ EARLY ORGANIZATIONAL STRUCTURES CREATED**  
 22 **AN IMMOVABLE FOUNDATION THAT FACILITATED THE SYSTEMIC**  
 23 **PHYSICAL AND SEXUAL ABUSE OF CHILDREN**

24           33. Founded in Boston in 1979 under the “Boston Movement” moniker by  
 25 Thomas “Kip” McKean (“Thomas McKean”, “Kip” or “McKean”) (and 29 other  
 26 members) through secession from the Church of Christ in Gainesville, Florida. The  
 27 fledgling “church” quickly sought new members upon formation and enjoyed  
 28 considerable expansion and success. After the Boston Movement obtained religious

1 and corporate recognition as the International Church of Christ in the 1980's, **ICOC**  
 2 **swiftly grew into a multinational movement.** According to the ICOC's self-reported  
 3 statistics, the ICOC is a body of approximately 700 cooperating Christian non-  
 4 denominational congregations spread across 144 nations, with more than 120,000  
 5 members worldwide.

6 34. Although ICOC contends that each ICOC church location is unrelated to  
 7 the others, they present a unified front and hold themselves out to the general public as  
 8 a fiercely loyal consolidated unit. However, when any church comes under scrutiny for  
 9 any reason, the churches conveniently distance themselves from the scrutinized church.  
 10 Regardless of the churches' feigned individuality, their websites clearly delineate the  
 11 interconnectedness of all ICOC locations, specifically in connection with their general  
 12 structure, belief system, Chairs, overseers and delegates of each department.

13 35. In 1979, the Church of Christ that helped spawn ICOC and eventually ICC,  
 14 was jointly led by Charles Howard Lucas ("Chuck" or "Chuck Lucas"), a licensed  
 15 psychologist at the time, and McKean. It is commonly understood that **McKean, was**  
 16 **acutely aware of, the physical, psychological, and sexual abuses Lucas and other**  
 17 **church members wrought upon children and adult parishioners.**

18 36. Academic writings, journals, recovered correspondence, newspaper  
 19 articles, eyewitness accounts, and publications like the book, "Toxic Christianity,"  
 20 which was written by former ICOC leading members under the pseudonym "Mr. X".<sup>1</sup>  
 21 These are but a fraction of the litany of information depicting the practices and abuses  
 22 Defendants institutionalized to the point of normalcy within the church.<sup>2</sup>

23 37. ICOC was incorporated in California in December 1994. Its Articles of  
 24 Incorporation filed with the California Secretary of State stated that upon dissolution,  
 25

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26 <sup>1</sup> Toxic Christianity. It's widely believed that Rick Bauer co-published with another church leader under the pseudonym  
 27 "Mr. X" and can be accessed in its entirety here: <http://www.reveal.org/library/theology/Toxic.pdf>

28 <sup>2</sup> Writings from former members and ICOC leaders, in addition to information about the ICOC/ICC churches  
 organizational structure, religious dogma, and their associated analyses can be found at  
<http://www.reveal.org/library/psych/stumpk.html>

1 “the remaining assets of this Corporation shall be distributed to...the individual  
2 congregations that are part of the worldwide fellowship of churches of Christ (which  
3 are affiliated with the Corporation), if they qualify as distributees under the provisions  
4 of this Section.”

5 38. The International Christian Church (ICC) was founded by Kip McKean in  
6 2006 after he was forced out of ICOC. ICC was registered in California as a nonprofit  
7 religious corporation in October 2006, and as of December 2022, ICC listed 104  
8 affiliate churches on its website. Articles of Incorporation filed by ICC with the  
9 California Secretary of State included references to affiliates of ICC. One part stated  
10 that upon dissolution of ICC, “the assets of this Corporation shall be distributed to other  
11 nonprofit funds, foundations or corporations affiliated with the International Christian  
12 Church.”<sup>34</sup>

13 39. Defendants are independently operating a **highly profitable pyramid**  
14 **scheme supported by a web of paper corporations and sham 501(c)(3) entities,**  
15 **culminating in hundreds of millions of dollars in illicit gains.** The full extent of ICOC  
16 and ICC’s profiteering is unknown, especially given the tithing and labor contributions  
17 ICOC and ICC routinely coerce from their members.

18 40. ICOC and ICC also benefitted from millions in governmental support  
19 through forgivable PPP loans<sup>5</sup> and ICC benefitted from millions in members’ personal  
20 SBA loans, authorized under the Coronavirus Aid, Relief, and Economic Security Act  
21

22 <sup>3</sup> Between April 2020 and February 2021, 18 branches of the ICC received Paycheck Protection Program (PPP) loans.  
23 These loans totaled \$287,490, and a total of \$290,040 was forgiven, including accrued interest.

24 <sup>4</sup> Churches associated with the ICOC appeared to be incorporated into separate entities, according to a review of public  
25 records. For instance, the Los Angeles International Church (LAICC), the largest ICOC church by membership, was  
26 incorporated in California in December 1990, according to corporate records with the California Secretary of State. The  
27 Los Angeles International Church (LAICC) described its structure on its website, noting that it’s “organized into eight  
self-supported regions. Each regional evangelist has been given the charge of equipping the brothers and sisters in his part  
of the LA church (region) to effectively evangelize his area with the saving message of Jesus Christ as well as helping one  
another mature in Christ.” Notably, “each region has a regional financial advisory group that assists the ministry staff and  
the Board of Directors with the oversight of the finances in their particular region.”

28 <sup>5</sup> During the COVID-19 pandemic, branches of ICOC received 77 Paycheck Protection Program (PPP) loans, totaling over  
\$9.4 million. **Over \$9.2 million of those loans were forgiven**, including accrued interest. (projects.propublica.org,  
accessed December 15, 2022; disciplestoday.org, accessed December 15, 2022)

(CARES Act). Through their veiled abuse of the corporate form and systematic financial exploitation of their members, Defendants have created a cash cow built upon complex layers of deceit and manipulation of their vulnerable members.

41. The following is a quote taken from a 2021 ICC YouTube video wherein McKean bragged about members turning over their COVID-19 relief funds to the church:

*“During Covid, while the (financial) giving inside most religious organizations declined, our giving inside of God’s Sold-Out Modern-Day Movement steadily increased! Due to our disciples receiving \$3000 each in stimulus checks, and approximately \$6000 total per couple, these members turned over that stimulus money to the church. As a matter of fact, the sold-out ICC Disciples are now giving \$250K every single WEEK!”<sup>6</sup>*

*“In addition to this money, and according to God’s promise of always taking care of his people, the Sold-Out movement was further blessed by the government providing SBA loans to our members. Therefore, we were able to bring in \$1.2 million of SBA loans to God’s sold-out movement. We in turn used this SBA loan money to start 22 churches around the world. Isn’t that incredible!! To God be the glory!”*

42. One example of a tax-exempt corporation under the ICOC/ICC corporate umbrella is the sham charity organization Defendant HOPE, which has generated over \$100 million in tax-free revenue over the last six years. On information and belief, **HOPE and ICOC often commingled these funds and made arbitrary decisions regarding where “donation” money meant for HOPE would eventually be disbursed.**

43. Chuck Lucas led the CrossRoads Church of Christ in Gainesville, Florida, before he was paid off to leave Florida and start another church in approximately 1986,

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<sup>6</sup> Currently, the sold-out ICC Disciples are now giving approximately \$360K per week.

1 with the explicit goal that **Chuck would no longer be associated with the ICOC**  
 2 **because of his deviant behavior.** ICOC and McKean strategically downplayed  
 3 Chuck's pattern of abuse by labeling his conduct as "recurring sins." Sadly enough,  
 4 these "recurring sins" were never investigated by ICOC.<sup>7</sup> Defendants, McKean and  
 5 other church leaders were acutely aware of Chuck's disturbing pattern of abuse, but  
 6 nevertheless actively concealed Chuck's misdeeds to avert discovery by the police.

7 44. Chuck died in August 2018, however, Plaintiffs and scores of members  
 8 witnessed his ongoing abuse of children and adults within the congregation through the  
 9 end of his despicable life.

10 45. Sam Laing, one of Chuck's continued faithful supporters and a prominent  
 11 lead evangelist with ICOC, was aware of Chuck's deeply disturbing abuses and its  
 12 chronology. Sam Laing recently made a statement about Chuck in a 2018 article  
 13 published in "Disciples Today," which is an ICOC owned platform/news source:

14 **"Chuck Lucas was a man of deep conviction. He was a**  
 15 **disciple of great courage and perseverance. He was**  
 16 **criticized, persecuted and attacked for what he stood**  
 17 **for, but he never quit. Yes, he had his weaknesses and**  
 18 **failures along the way, but he, by grace, repented and**  
 19 **overcame them, and was restored."**<sup>8</sup>

20 **McKEAN FORMED ICC, A CARBON COPY OF ICOC, TO CONTINUE THE**  
 21 **SAVAGE ABUSE ENTERPRISE**

22 46. In or about 2003, McKean formally split from ICOC after an uprising and  
 23 various op ed public letters were published by ICOC leaders. He officially formed ICC  
 24 in or about 2006. ICC encompassed the same guiding principles and culture as ICOC.

25 \_\_\_\_\_  
 26  
 27 <sup>7</sup> History Repeats Itself: The Rise and Fall of Kip McKean & Chuck Lucas. Ryan Britt. 2002. Accessed on December  
 29, 2022 at <http://www.reveal.org/library/history/britt2.html>

28 <sup>8</sup> Chuck Lucas: A Servant of God. Sam Laing. 2018. Accessed on December 29, 2022.  
<https://www.dtdayarchive2.org/chuck-lucas-gods-servant-and-how-he-used-him>

1 **ICC was a carbon copy of ICOC, however, ICC eventually eclipsed ICOC in terms**  
 2 **of the mania, secrecy and abuse that occurred within its churches.**

3 47. From its inception, ICC improved upon ICOC's tools of mass  
 4 manipulation and exploitation, which aligned with McKean's vow to learn from any  
 5 past incidents of dissent or divisiveness and ensure that challenges to his authority never  
 6 occurred in his new "movement of God".

7 48. McKean currently oversees all ICC operations from its Los Angeles  
 8 headquarters and he has completely separated himself from ICOC because he believes  
 9 the entire ICOC congregation is lost, likely because he is no longer the leader. ICC's  
 10 current membership is believed to include approximately 7,000 individuals.

11 49. A former leader of ICC, Coltin Rohn, oversaw the Columbus, Ohio ICC  
 12 congregation and was **fired for publicly voicing concerns surrounding McKean and**  
 13 **other ICC leaders' financial abuse, coercion, and control.** Coltin was a full-time  
 14 evangelist with ICC but was immediately fired for criticizing the church's tactic of  
 15 bullying members to give a specific amount of money to the church. Coltin was deeply  
 16 concerned about the church's practice of threatening a members' salvation and standing  
 17 within the community if they did not give 10-40% of their annual income to the church.<sup>9</sup>

18 50. On or about December 24, 2022, Coltin became aware of an ICC letter,  
 19 sent out to every ICC member showing the process of "marking" Coltin and his wife.  
 20 Defendants have continued to threaten anyone who speaks out against the church with  
 21 vexatious legal actions, disfellowship, and/or "marking."

22 ///

23 ///

24 ///

25 ///

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28 <sup>9</sup> The New York Daily News stated that "dozens" of former members of ICOC "call it a destructive sect that is more concerned with drawing in new members and draining their money than in matters of faith." **One ex-member of ICOC described ICOC as a "pyramid scheme" in which members "were all giving 10% to 40% of our income."**



1                    **THE “DISCIPLING” STRUCTURE IS THE FOUNDATION OF**  
2                    **DEFENDANTS’ DEPLORABLE CAMPAIGN OF MANIPULATION,**  
3                    **PSYCHOLOGICAL AND SEXUAL ABUSE OF CHILDREN**

4            51. ICOC was born from a “discipling” movement that arose among the  
5 Churches of Christ during the 1970’s and the church has maintained this practice in  
6 present times. This is a strict practice involving a “discipleship hierarchy” where a  
7 formal **discipleship tree or a top-down authoritarian hierarchy** was formed.

8            52. Church leadership assigns a specific and strategic discipleship partner to  
9 oversee and guide the other member. The “disciplining” movement was memorialized  
10 by Flavilil R Yeakley Jr. in a book titled “The Discipling Dilemma”. The **rigid and**  
11 **pervasive culture of fear, coercion, control, manipulation, judgment, exclusion,**  
12 **punishment**, along with the church’s overt focus on membership growth (i.e., its  
13 primary source of income), have resulted in a **widely accepted categorization of**  
14 **ICOC and ICC as toxic, destructive cults.**

15           53. Any member’s position, health, and wellbeing depend heavily upon  
16 success in expanding the congregational rosters. Defendants’ leadership created a self-  
17 perpetuating business model to attract new recruits/members, and in doing so, generate  
18 hundreds of millions of dollars in revenue for the church.

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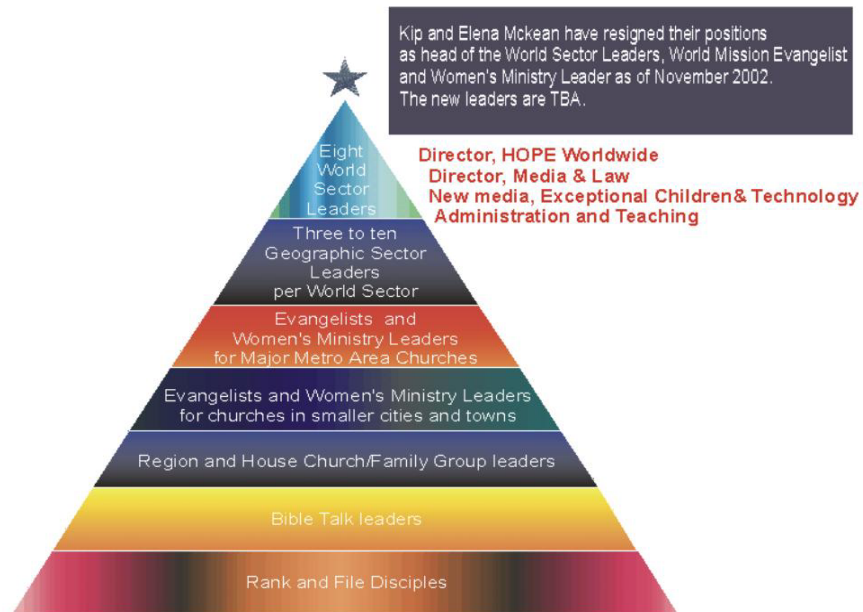
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54. An illustration of the Defendants' hierarchical model of authority is depicted below:

The ICC had a complex and highly hierarchical organizational structure, unusually so for a relatively new and small religious group. There are many layers of leadership, similar to a pyramid or the Roman Catholic Church.



The ICC has a pyramid-shaped, hierarchical structure of authority. At the top was Kip McKean, the *World Missions Evangelist*, and his wife Elena Garcia-McKean, who served as *Women's Ministry Leader* for the group as a whole. As of November of 2002, the McKean's

55. In addition to functioning as a life coach to other members, the "discipler" members also acted as de facto therapists. The disciplers would frequently instruct members to conduct themselves in a certain manner and if the member did not heed to the instructions, they were rebuked or labeled as "disobedient" or "arrogant" until they were eventually "broken" by their sins.

56. The discipler structure has facilitated Defendants' systemic concealment of abuse and allowed predators to abuse women and children with impunity. For example, on July 1, 2018, Damon and Vicki James, ICC "disciplers" working at the specific direction of McKean instructed a member to refrain from reporting two years of physical and sexual abuse by her husband. Damon James scolded this survivor and

1 stated, "[w]e don't do that to our brothers as disciples."

2       57. Vicki James then victim shamed the woman by stating "[w]hy would you  
3 have the heart to press charges?" Damon continued and told the woman, "[w]hat does  
4 that gain? That puts you in front of 'the world'." This situation resulted in the woman  
5 eventually defecting from ICC and she is trying her best to recover from the years of  
6 abuse she endured by her husband and ICC.

7       58. The following is a harrowing statement by Carter Whitten regarding the  
8 abuse he endured in connection with his "discipler" experience:

9               "For reasons I still don't fully understand, my 'discipler'  
10 met with me and two other teen boys at one of the boys'  
11 houses. In the basement we sat in a circle, and the goal of  
12 my discipler was to break me down and to get me to fully  
13 understand the horrors of Hell: Meaning what I had to  
14 look forward to if I didn't enter the Kingdom (the ICOC)  
15 before I died. So next he took it upon himself to paint a  
16 vivid picture for me: My discipler described a scene in  
17 hell in which I was nailed to a ceiling by my PENIS and  
18 spun around by a demon. Hanging only by my genitals, I  
19 was forced to watch the devil RAPE my mother  
20 repeatedly for all eternity. I was then asked to take that  
21 grotesque vignette and multiply its terror by 10,000 (or  
22 some other arbitrarily large number) to catch even a  
23 glimpse of how utterly horrifying the future awaiting me  
24 was, unless I was to get baptized and be saved. I finally  
25 broke down and cried. Which was clearly the goal, as the  
26 ICOC famously conducted what they called "breaking  
27 sessions."

28               In addition to completing their entire conversion series of  
Bible studies, there were even more hurdles I was told I  
had to clear in order to become a baptized disciple. One is  
that I had to call the fathers of all the girls in the teen  
ministry to whom I was sexually attracted, confess my  
sins of lust after their daughters, and ask for the fathers'  
forgiveness. I was mortified. I then asked another teen  
boy—a good friend of mine, if he had been made to do  
the same thing before he got baptized. He revealed he had  
indeed been told to do so, and was terrified by the whole

1 ordeal and shunned by most of those fathers.

2 The final step was the sin letter or sin list. All disciples-  
3 in-training (those studying the Bible) were expected to  
4 write an exhaustive letter to God, documenting every  
5 single sin they had ever committed in their entire lives and  
6 asking for forgiveness. The letter was usually meant to be  
7 read aloud in a group setting. I was only 14.

8 I must have been twelve or thirteen when I realized that  
9 almost every conversation or sermon in the teen ministry  
10 was talking about lust and masturbation and sexual sin on  
11 some level. So now looking back as an adult, I am  
12 horrified by how perverse and abusive this culture was.  
13 Like many evangelical denominations, the ICOC  
14 indulged in purity culture and thus placed a heavy  
15 emphasis on sexual purity.

16 But the ICOC took it to a whole new level, the way that  
17 adults dealt with teens in these ministries—children that  
18 were not their children—Seems criminal to me. At the  
19 very least, it was a gross and egregious abuse of the power  
20 dynamic between adults and children. And I know enough  
21 people across the country in the ICOC to know that this  
22 was not an isolated incident, it was literally happening in  
23 every ‘teen ministry.’

24 But even worse than this, I had a friend that was  
25 physically assaulted while he was studying the Bible,  
26 because he tried to get up and leave. So the teen leader  
27 held him down and beat him up.

28 We had to meet in one-on-one and group D-times, where  
we had to confess our sins (especially sexual sins) in a  
group setting, and the disciplers (teen leaders) would  
sometimes confess sins as well. During one such meeting,  
an adult discipler confessed to a group of four or five boys  
that he had had a wet dream (nocturnal emission) that  
week, and in many other meetings we were told by  
disciplers that masturbation equated to "ejaculating on the  
cross." I never understood why grown men were spending  
so much time with boys as young as 12 and 13 confessing

1 all their sexual sins to them... I heard things I had never  
 2 heard before, and it all felt very abusive and inappropriate  
 3 to me, even as a child.

4 Why were grown adults grilling other people's teenagers  
 5 for specific sexual details... When most of these teens had  
 6 never even had a sexual experience in their life. The abuse  
 7 of power here and power dynamics were so damaging to  
 8 most of these teens in the teen ministry, that the PTSD and  
 anxiety and therapy that most of these children have  
 needed their whole lives is astounding."

9 **CHURCH LEADERS WERE OBSESSED WITH FINANCIALLY**  
 10 **EXPLOITING ITS MEMBERS**

11 59. McKean, along with other ICOC leaders were obsessed with growing  
 12 church membership and, therefore, **imposed recruiting quotas on members**. All  
 13 members were required to attempt to recruit a certain number of new members each  
 14 day and members were also required to bring visitors to all church events. ICOC  
 15 imposed quotas for everything imaginable. **Members were isolated from outsiders**  
 16 **and the church cultivated an atmosphere that promoted and concealed the**  
 17 **systemic abuse of women and children within the church**. Members were together  
 18 every day, and they were not allowed much, if any, contact with family members or  
 19 friends who were not church members. Of course, the only exception to this strict rule  
 20 is that members could contact outsiders for the sole purpose of recruitment.

21 60. Defendants' members were forced to tithe and give 10-40% of their gross  
 22 income to the church *and* participate in special contributions for missions  
 23 approximately twice a year equaling approximately **40 times their normal tithe**  
 24 **amount**. ICOC was relentless in its pursuit for funding and church leadership would  
 25 resort to **interrogating members about their income**, going so far as to **demand**  
 26 **copies of the members' paystubs**. For example, if a member gave \$4,000 per month,  
 27 the total mission contributions for that year would equal an additional (40x) and the  
 28 total required sum would be \$160,000 in addition to the normal yearly tithe amount of

1 \$48,000. This member would be required to give the church a whopping total of  
 2 \$208,000 for the year! Unfortunately, only a minuscule percentage of money (noted on  
 3 internal ICOC pie charts), approximately 8-10% was disbursed for “special missions  
 4 contribution.” On information and belief, most of the money collected from ICOC  
 5 members was used to pay upper leadership salaries.

6 61. If the tithing budget was not satisfied, leaders or “disciplers” were forced  
 7 to contribute the financial shortfall themselves, or members were required to **locate the**  
 8 **offending member who failed to tithe and sit on their porch until they arrived**  
 9 **home to obtain their tithe funds before Sunday evening was over.** The pressure to  
 10 comply with the church’s rigid demands was a source of anxiety and depression for  
 11 many members. So much so that **several ex-members committed suicide.**

12 62. In 2005, two former ICOC members filed a suit in Tennessee “claiming  
 13 the church uses cultlike tactics, manipulation, peer pressure and guilt to force members  
 14 into tithing and making other financial contributions.” They alleged that for personal  
 15 gain, “the Nashville Church, the [ICOC], Hope Worldwide, and Central and South  
 16 America World Sector jointly participated in a scheme to defraud church members,  
 17 who are not allowed to inspect the church’s financial records.”

18 63. A former member named Tina witnessed Non-Disclosure Agreements  
 19 being forced upon parishioners, claiming that they could never talk about the true  
 20 finances of the Defendants despite evidence that ICOC opened offshore accounts  
 21 containing massive quantities of cash.<sup>10</sup>

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25  
 26 <sup>10</sup> Top leaders of the ICOC put “different ICOC assets and properties in their names” to shelter and hide those assets “so  
 27 that the church didn’t specifically own them.” For example, The Bay Area Christian Church listed its address at the  
 28 location of the HOPE Technology School for Autistic Children, which was owned by Bay Area Christian Church  
 executive minister Russ Ewell. As of 2022, the property had a total assessed value of \$7.7 million, all of which was  
 exempt from taxes under another exemption. The Bay Area Christian Church also received a PPP loan of \$764,600 in  
 April 2020.



64. Moreover, McKean actively solicited church members to turn over their COVID-19 relief money to the church. The following are excerpts of emails from McKean to various church elders and leaders:

I would like to address the USA Churches, but I want all of the International Churches to realize "our" unprecedented situation and unprecedented opportunity. Recently, the USA Congress passed a 2 Trillion USD Stimulus Package. Already this week, many Americans received their \$1,200 stimulus checks from the government. The World Sector Leaders knew this was coming, so we laid out a plan for every USA Church to help make Missions: 40% of the membership will give all of their stimulus checks; 40% give half; 20% raise their missions contribution pledge some other way. Prayerfully, many churches will exceed these goals!

**Here are my charges for the USA Churches:**

1. Call your members to give their stimulus checks ASAP. Americans are known to spend everything in their accounts. The great Chicago Church has called these \$1,200 checks "Manna from Heaven!"

Presently, all around the world, if a member misses 2 or 3 weeks – usually recognized by missing 2 or 3 weeks of weekly contribution – this is a red flag that they may have become unfaithful. (There of course are always exceptions.) It is a fact that almost every USA Disciple has the ability to give online. So discipling in the COVID-19 Era must include how to give one's weekly contribution online.

Therefore, in the COVID-19 Era to show more forbearance and grace, if a person on your membership has not given for 4 straight weeks – remember this is the USA Churches not third world like India, the Philippines, Africa and some nations of Central and South America – then we must have the conviction that they have become unfaithful to God. At this point, after consulting your World Sector Leader then a decision needs to be made concerning the removal of their name from your membership. However, before that is done, the Evangelist or Women's Ministry Leader must contact them to see if there are extenuating circumstances. Take each situation on a case by case basis.



**ICOC AND ICC MEMBERS WERE SYSTEMATICALLY BRAINWASHED  
AND MANIPULATED INTO SILENCE**

65. Initially, early recruits received profound amounts of “love bombing” to lure them into a false sense of security, thereby allowing sexual predators to successfully manipulate them and eventually abuse them with the comfort of knowing these vulnerable and newly brainwashed people would never report the abuse.

66. Each member is trained to understand, which they come to wholeheartedly believe that in connection with the church, **“compliance was the path of least resistance.”** Members sincerely believed they needed to follow the Bible verbatim and **Defendants, including their leadership, were the only “true” modern-day disciples on Earth.**

67. Church members were a dynamic and diverse group, consisting of scores of successful individuals such as doctors, lawyers, professional athletes, actors, teachers, business owners, PhDs, and **a remarkable number of leaders possessed psychology degrees.**

68. It is without doubt that their education and training enabled these members to psychologically deplete members and manipulate children and their parents into submission, which created fertile ground for heinous sexual and physical abuse to thrive.

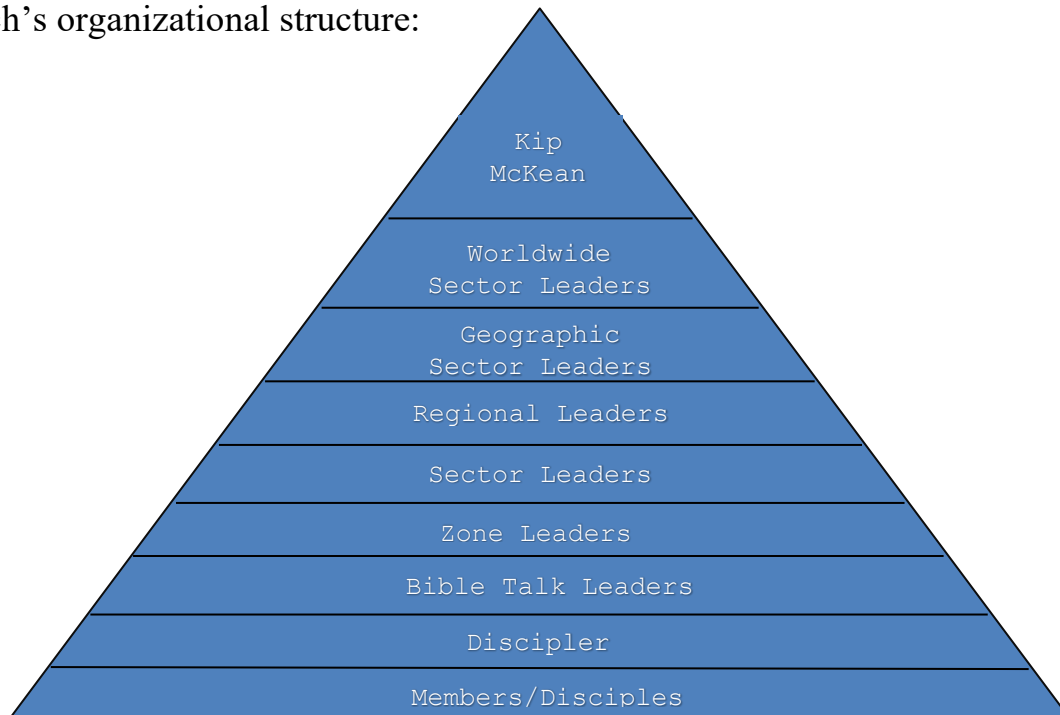
69. One psychologist ICOC member currently owns a school for autistic children in the San Francisco area and he has been accused of multiple instances of sexual abuse of adults and children/teenagers while he was in Boston. ICOC and McKean were aware of this despicable man’s repeated abuse, but **McKean orchestrated his relocation from Boston to San Francisco to conceal his predatory practices and avert criminal prosecution.**

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70. McKean's carefully crafted church hierarchy lent itself to maintaining secrecy and preventing outside intervention. The following is a rough depiction of the church's organizational structure:



71. Defendants' structure was purposefully organized in this manner to **ensure the abuse within the church remained a secret to all outsiders**, including the authorities. Indeed, someone within the church was always monitoring lower ranking members and giving them explicit instructions on how to conduct themselves.

72. Questioning higher ranking members or the church in any manner was frowned upon. Some individuals were "disfellowshipped" or "marked" for being divisive if they asked too many questions or questioned any leaders. A member with either of these labels was **fiercely ostracized by the entire membership, including their families**. "Disfellowshipped" members are essentially excommunicated and shunned from Defendants' communities. Accordingly, being labeled as "disfellowshipped" or "marked" equated to hell on earth and in the afterlife for any member so labeled.

73. In furtherance of the Abuse Enterprise, the pyramid hierarchy also paved the way for leadership to require that **all ICOC and ICC members receive mental**

1 **health services (i.e., therapy) *exclusively* from church therapist members.** The  
 2 therapist members were biased in favor of the church and tailored their treatment and  
 3 “findings” based on guidance and instruction from McKean and other leaders within  
 4 ICOC and ICC. These therapist members’ strong bias is best evidenced by the fact that  
 5 a single instance of abuse was never reported to the police. In fact, these therapist  
 6 members routinely instructed victims to refrain from reporting the abuse to the police,  
 7 along with instructions to “forgive” the abuser for their heinous transgressions.

8 **DEFENDANTS CREATED A SICKENING CONVERSION THERAPY**  
 9 **MINISTRY TO FACILITATE THE BRAINWASHING SCHEME THAT**  
 10 **MANIPULATED ADULTS AND CHILDREN INTO SILENCE**

11 74. ICOC implemented a LGBTQ+ conversion therapy ministry called  
 12 **Strength in Weakness spearheaded by Guy Hammond.** Strength in Weakness  
 13 offers/offered its members three options: live the remainder of their lives celibate;  
 14 partner with someone of the opposite sex; or continue living their homosexual life of  
 15 sin and spend their afterlife in eternal damnation. Although “conversion therapy” is  
 16 banned in several states, **ICOC used this ministry for conversion therapy under the**  
 17 **pretext of a support system.** ICOC has held at least 20 Strength in Weakness  
 18 “conversion therapy” seminars in states where conversion therapy is banned.

19 75. The mere existence of Strength in Weakness is nothing short of ironic, as  
 20 it became **common knowledge within the churches that Chuck Lucas had**  
 21 **numerous homosexual relationships with young men in the church.** In a 2022  
 22 podcast with Steve Johnson, ICOC evangelist James Lloyd stated:

23 “The truth is that the foundational “original sin” of our  
 24 movement was homosexual sin. Man on man, specifically  
 25 a male older leader, on young interns. And not just a few  
 26 times—you can find out, it’s not like nobody knows. The  
 27 fact that our original sin was a senior leader (Lucas) who  
 28 is respected and loved and training a group of young  
 men—As the leader gets them in a room and shuts the  
 door and this leader (Lucas) ‘puts the moves’ on these  
 young men. And it’s worse than it sounds because those

1 men then became ministers (perpetrators) and went out  
2 into their churches and did the same things to others—  
3 and I know that personally, because I was in some of those  
4 meetings where it was confessed.

5 They thought it was best not to share this with anybody,  
6 and I bought into those reasons. They would say things  
7 like, ‘He’s got children, he’s got a wife, you can’t just say  
8 those things out loud, it could hurt the faith of a young  
9 Christian.’

10 All these things are just the hierarchy and patriarchy  
11 saying that we don’t need to bring this thing up about  
12 ‘man on man.’ And I don’t personally think that this sin  
13 is any different than if it was between a man and a woman  
14 by the way— I’m only calling it sin because they weren’t  
15 married.

16 But the real sin here is that we (church) hid it. People  
17 should be taught that this is how our group started. And  
18 some of that (sin) has continued for three generations.  
19 Some of that trauma was carried on, was passed on to  
20 other men as they went out into other (ICOC) churches.”

21 **DEFENDANTS SHAMELESSLY PREYED UPON AND DEFRAUDED**  
22 **COLLEGE STUDENTS**

23 76. Defendants have increasingly focused on **recruiting college students**. By  
24 utilizing college campuses across the globe as its primary hunting grounds, they are  
25 more successful at grooming new members but have an opportunity at pecuniary gain  
26 by convincing them to pay for a worthless education. On information and belief, ICOC  
27 operates a campus ministry at Pepperdine University under the name “Alpha Omega”  
28 to conceal its connection to ICOC.

77. The practice of preying upon college students resulted in numerous  
televised exposés in the mid-1990’s when the ICOC cult commanded larger numbers,  
including but not limited to: 20/20 with Barbara Walters, Inside Edition, Fox News,  
BBC, and MTV.

1        78. These news stories were explosive and highly negative representations of  
 2 the church, as many parents were crying out to the media for help because their college  
 3 aged children were being brainwashed by a cult. Some parents expressed that they felt  
 4 like their children were kidnapped by ICOC.

5        79. Indeed, ICOC and ICC's exploitation of college students ultimately  
 6 resulted in the ICOC\ICC being **banned from on-campus recruiting from several**  
 7 **schools across the nation**, including but not limited to Boston University, which is  
 8 situated near the epicenter of the ICOC. Surprisingly, the exposés did not garner  
 9 enough outrage among the general population, leaving the ICOC\ICC to continue to  
 10 prey upon college students without repercussion. Until now, the ICOC has had the  
 11 luxury of the benefits from their long-time obfuscation of their parasitic internal  
 12 practices.

13        80. Mr. McKean is so brazen that he **publicly admitted to defrauding**  
 14 **students** by handing out unearned, illegitimate, and meritless doctoral degrees  
 15 designed to both inflate the importance of its senior members and extract unearned  
 16 pecuniary gains. The following online information about ICC college states that:

17                "The ICC runs an unaccredited college, called the  
 18 International College of Christian Ministries, or ICCM,  
 19 where they are handing out doctorates to anyone they  
 20 choose, where the established course work is limited only  
 21 to literature/books created within the ICC. This is why  
 22 most leaders in the ICC put the abbreviation of "Dr" in  
 23 front of their names, because they have been giving each  
 24 other unaccredited doctorate status. The ICCM has already  
 25 brought in approximately \$6 million through ICC  
 26 members attending this unaccredited college."

27        **DEFENDANTS ACTIVELY CONCEALED ABUSE, INCLUDING THE**  
 28        **FORCIBLE RAPE OF A 3-YEAR-OLD GIRL**

29        81. The active concealment of systemic abuse within the churches by a **den**  
 30 **of "religious" sexual predators** was the impetus of a devious and rampant culture of  
 31 psychological abuse and manipulation, willfully ignoring the pervasive sexual abuse

1 of children and adults throughout the churches and actively concealing abuse from the  
2 authorities.

3 82. In furtherance of efforts to protect the church and its primary source of  
4 revenue (its members) at all costs, Defendants attempted to cover up these disgraceful  
5 crimes by manipulating members with remarks from McKean such as:

6 *“We cannot report these abuses, because it would hurt*  
7 *our church, which is God’s Modern-Day Movement.”*

8 *“Do you want the fall of God’s modern-day movement*  
9 *on your head????!!”*

10 *“The cause of protecting God’s Kingdom on earth is*  
11 *more important than the sin or the pain of a few*  
12 *individuals.”*

13 *“We need to forgive our brothers who sin and realize that*  
14 *they are a new creation in Christ, and give them a chance*  
15 *to make things right. If we report them, it will destroy*  
16 *their lives and hurt the church.”*

17 83. In addition, the church engaged in strategic victim blaming and victim  
18 shaming. For example, **young children who were abused were later blamed for that**  
19 **abuse when the ICOC would assert how their clothing was “too provocative”.**

20 84. One former member of the East Region Los Angeles ICOC was pressured  
21 and ultimately convinced to refrain from reporting her 3-year-old daughter’s abuse.  
22 She was told that if she reported the abuse, it could “ruin everything” and bankrupt the  
23 church. **McKean himself contacted this woman and personally thanked her for**  
24 **her “loyalty” and for not reporting the abuse to the police.** He congratulated her on  
25 her strength and courage to endure the situation with such faith.

26 85. An ICOC affiliate, formerly known as AMS Ministry of the Los Angeles  
27 ICOC, and currently known as **Turning Point Church has similarly facilitated and**  
28 **concealed abuse.** Recently, Turning Point Church claimed publicly that no sexual  
abuse has occurred in their church, however, there are at least three survivors that  
reported abuse to staff members who took no action with the reported abuse and never  
alerted the congregation to the existence of sexual predators, some of whom worked in

1 Kids Kingdom (children's ministry).

2 86. Turning Point Church's leadership that ignored reports of abuse include  
3 the following: Kevin and Tracena Holland, Mike and Kim Upton and Jay and Traci  
4 Minor. In addition to the foregoing, Turning Point Church uses a licensed "Marriage  
5 & Family" counselor named David Bruce, who is a mandated reporter. Mr. Bruce,  
6 notwithstanding his knowledge of abuse, refused to report several instances of abuse  
7 and helped conceal the abuse for the Defendants' benefit.

8 87. One former member of the Los Angeles ICOC and the Turning Point  
9 Church, Sandi Derby, Advanced Grief Recovery Specialist, Trainer for The Grief  
10 Recovery Institute and Ordained Minister, has "firsthand knowledge that allegations  
11 of sexual, physical, and psychological abuse of teens and adults were brought to leaders  
12 in Turning Point in 2019 for abuses that occurred in the early 2000s." This former  
13 member witnessed leadership's failure to support the abuse survivors and their failure  
14 to report the abuse to the police. As a result of her open support for the survivors, this  
15 former member was discredited within the church, which eventually led to her  
16 defection.

17 88. The Hampton Roads ICOC location in Virginia has also received reports  
18 of abuse and done nothing in response. Specifically, Ed and Dr. Deb Anton were  
19 informed of the sexual abuse of a teen ministry member and refused to report the abuse  
20 or alert the congregation to the existence of a sexual predator within the church.

21 **DEFENDANTS' DOCTOR MEMBERS ILLEGALLY MEDICATED YOUNG**  
22 **CHILDREN IN FURTHERANCE OF THE ABUSE ENTERPRISE**

23 89. Defendants' abuse went far beyond physical, psychological, and financial  
24 exploitation. Many children, such as Anthony Stowers, were administered medication  
25 by church affiliated "doctors". Often, the affiliate doctors such as Dr. Kris Stowers  
26 (Anthony's uncle) would administer medications that were prescribed for other  
27 conditions or children received medication for conditions for which they were never  
28 diagnosed. To conceal their illegal conduct and minimize scrutiny, **Defendants'**



1 **doctors provided the children with medication in unmarked or mismarked**  
2 **bottles.**

3 90. One of these affiliate physicians is a staff doctor at Florida State  
4 University and another that has **administered medications to children for mental**  
5 **illness despite lacking any qualification to do so medically or through public**  
6 **license.** On information and belief, this physician is an orthopedic surgeon for athletes.

7 91. **Medicating children has also facilitated the ICOC's clandestine**  
8 **efforts to conceal the ongoing child abuse from anyone outside the church.** The  
9 children were persuaded to believe, through strategic pharmacological deception and  
10 psychological manipulation, that they were never abused and if their own memories  
11 seem contradictory, then their memories were faulty.

12 **DEFENDANTS LEVERAGED CHILDREN'S MINISTRIES TO**  
13 **EFFECTUATE THE ABUSE ENTERPRISE**

14 92. The children's ministry was named the **"Kids Kingdom", which served**  
15 **as a demented playground for the multitude of sexual predators within**  
16 **Defendants' churches.** Countless instances of abuse happened within the Kids  
17 Kingdom, as the program hosted mission trips (HOPE Worldwide), social events and  
18 the children frequently visited members' homes.

19 93. Defendant HOPE Worldwide is ICOC's benevolent arm wherein  
20 teenagers took mission trips around the world to spread God's Word. Many of these  
21 children who were participating in what they believed to be an evangelical trip, were  
22 ultimately sexually abused by vile adult men. Children and/or their parents reported  
23 the sexual abuse, including rape, to elders and doctors (i.e., mandated reporters) within  
24 the church, however, the church never bothered notifying the police of the illegal  
25 activity. **There were no instances of any ICOC medical doctors reporting the**  
26 **abuse to anyone, let alone anyone outside the church.**

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28 ///

**DEFENDANTS PROMOTED THE DEPLORABLE PHYSICAL ABUSE OF CHILDREN UNDER THE GUISE OF “DISCIPLINE”**

94. In addition to sexual abuse, ICOC and ICC children were routinely physically abused under the pretext of “discipline”. Church leadership often recited the following commonly known passage from Proverbs 13:24 as justification for child abuse: “Those who spare the rod of discipline hate their children. Those who love their children care enough to discipline them.”

95. For example, members were instructed to **spank children, including infants, with a wooden paddle, custom made with a heart shaped hole in it, to create a more aerodynamic and effective (painful) spanking device**. A true and correct image of the heart shaped paddle is depicted below:



1           96. Members were instructed, with visuals, how to **use corporal punishment**  
 2 **without leaving bruises, welts or red marks, so the offending members could not**  
 3 **be reported to child protective services.** One former member recalls frequently  
 4 seeing young children at church with welts or bruises on their thighs. On one occasion,  
 5 this member witnessed a child with a “heart shaped welt” on his/her body.

6                   **1,200,000 PEOPLE DEFECTED FROM ICOC AND ICC AFTER**  
 7                   **GROTESQUE ABUSES WERE EXPOSED**

8           97. Since at least 1979, ICOC and ICC have averted suspicion by authorities  
 9 notwithstanding the fact that in excess of the last 40 years, **predatory members have**  
 10 **escaped prosecution for countless instances of sexual abuse (children and adults),**  
 11 **physical abuse (adults and children), spousal abuse, and emotional abuse.**

12           98. From its inception in 1979 to the present, approximately **1,200,000 souls**  
 13 **defected from ICOC.** The large number of defectors is due, in large part, to the  
 14 explosive growth that ICOC experienced.

15           99. For three consecutive years, the ICOC was labeled in the religious world  
 16 as the **fastest growing church on the planet.** Simply put, ICOC’s growth was nothing  
 17 short of profound. On the other hand, its bleeding was also profound, because members  
 18 defected in record numbers as they became increasingly aware of the heinous,  
 19 pervasive abuse of children and adults and the corresponding cover ups. These  
 20 courageous souls would simply disappear, never again to be seen by anyone in the  
 21 church.

22           100. According to some of the most respected cult experts around the world,  
 23 including but not limited to Dr. Steve Hassan PhD, Defendants are some of the most  
 24 dangerous cults in existence. This is primarily because of the church’s insidious tactic  
 25 of masquerading as the Christian church next-door with a deeply rooted Biblical  
 26 foundation. On its face, this public image of the church seems innocent and believable,  
 27 however, **the church’s internal machinations are characterized by unmitigated**  
 28 **systemic and chronic physical and sexual abuse of children and adults of both**

1 **genders within the church.**

2 101. Defectors have since revealed the abuse they suffered and/or witnessed at  
3 ICOC and ICC. Former member Lisa Johnson who as a top leader in New York City  
4 and a friend of McKean, in a podcast called “Eavesdropping” made the following  
5 comments regarding the church, based on her personal experience. This is a quote by  
6 Lisa Johnson from a recent episode of their podcast called “Eavesdropping.”

7 *“Women (in the ICOC) are getting ground up, and I mean*  
8 *tons of people, it’s not an isolated case here and*  
9 *there....And I think about these women now, after all these*  
10 *years...*

11 *So I’m gonna bring up something here...*

12 *...The sexual abuse....there has been sexual abuse, there*  
13 *has been emotional abuse, and there has been some*  
14 *physical abuse of women... and part of that is the issue of*  
15 *patriarchy. We developed a system and a way that was not*  
16 *safe for women....There are women that have been very*  
17 *damaged and ground up by that.*

18 *The fruit of this is so obvious, how can you miss it?! How*  
19 *many women have been told to stay with their physically*  
20 *abusive husbands and how many women have been*  
21 *sexually abused?!”*

22 **DEFENDANTS AUDACIOUSLY AND REPEATEDLY REFUSED TO**  
23 **REPORT PEDOPHILES WHO WERE LATER ARRESTED AND**  
24 **PROSECUTED**

25 102. Several pedophiles have been arrested in connection with various abuses.  
26 These individuals committed numerous crimes before the police intervened and are a  
27 miniscule representation of the true number of predators who have operated with  
28 impunity within the church since 1979.

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1           103. In January 2012, David Iburg, aka David Saracino (“David” or “David  
2 Saracino”) was sentenced to 40 years of hard labor in the State of Louisiana, the  
3 maximum sentence, for forcible rape upon a 4-year-old girl in 2004.<sup>11</sup> The  
4 prosecutor, Cynthia Guillory, told the judge that he was among the worst of the worst.  
5 Mr. Saracino purposefully sought out women who were vulnerable and struggling  
6 financially so he could gain access to and victimize their young children. Mr. Saracino  
7 faced charges and convictions in Texas, Utah and Louisiana, where he received the 40-  
8 year sentence.

9           104. Mr. Saracino attended the East Region of the LA ICOC, where several  
10 members (single mothers) of the ICOC reported to the leaders in the East Region in or  
11 about 1998 that David Saracino had continuously molested their daughters. Ultimately,  
12 several police reports were filed by the parents, while the ICOC remained silent. Just  
13 as the ICOC did nothing to address these reports while David escaped to the San Diego  
14 ICOC and freely resided in the Escondido area temporarily. Like so many others, these  
15 mothers were told not to share with anyone else what David had done, as it would “hurt  
16 the church.”

17           105. David ultimately disappeared uncaptured. David was free to go on a  
18 nationwide crime spree, abusing and raping little girls along the way. David was finally  
19 caught, but only after an episode of America’s Most Wanted produced credible leads  
20 that resulted in his capture. Had ICOC assisted in his arrest or alerted their  
21 congregations, David Saracino could not have continued abusing children with  
22 reckless abandon. ICOC’s commitment to abject apathy is sickening and clearly  
23 intentional.

24           106. Since December 31, 2022, at least four of David’s previously unknown  
25 victims from the East Region Los Angeles ICOC have come forward regarding the  
26 abuse they endured, and it is believed there are scores of additional victims who are  
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<sup>11</sup> *State v. Iburg*, 12-2720 (La. 5/17/13), 118 So.3d 372

1 either too entrenched in the church or too scared to tell their stories.

2 107. In or about February 2018, a volunteer soccer coach named Waldo Milla-  
3 Guerra of Middlesex County, New Jersey was arrested on charges of possession and  
4 distribution of child pornography. Mr. Milla-Guerra volunteered at the South  
5 Brunswick Soccer Club and formerly taught at Kid's Kingdom at Central Jersey  
6 Church of Christ in North Brunswick.

7 108. In 2005, Benjamin Samuel Speights, a member of the south region of the  
8 LA ICOC, was convicted for lewd and lascivious acts against a child under the age of  
9 15. Mr. Speights' unlawful conduct included forceable participation of a 14-year-old  
10 girl to create pornographic videos that he sold.

11 109. In December 2020 Mr. Speights was convicted in Arizona in connection  
12 with a Class 2 felony of sexual exploitation of a minor as part of a negotiated plea deal  
13 related to child pornography charges. Mr. Speights was a leader in the "Kid's  
14 Kingdom" ministry in the El Segundo South Region of the Los Angeles ICOC. Several  
15 children at this ministry reported his physical abuse. Without a doubt, Mr. Speights has  
16 a sordid and despicable history of abusing children. Consistent with their historic  
17 complicity, Defendants never reported the abuse these children endured or attempted  
18 to prevent future abuses.

19 110. Nicholas Griffin Lombardi ("Mr. Lombardi") is another example of a  
20 known pedophile abusing children within Defendants' churches. He was a long-  
21 standing member of the ICOC, as were his parents. On or about November 27, 2022,  
22 as a clear demonstration of the kind of monster Mr. Lombardi truly is, Mr. Lombardi  
23 posted on his personal Facebook page "I kind of have a fantasy of fucking a child ha[.]"

24 111. Mr. Lombardi was convicted for lewd and lascivious acts against a child  
25 under the age 15. In addition, there are numerous accusations of abuse against Mr.  
26 Lombardi, however, Defendants refused to report his abusive conduct to the  
27 authorities, and he remains free to continue abusing children with impunity.

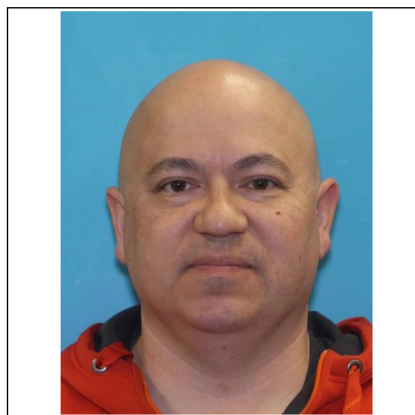
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112. In approximately August 2011, one ICOC abuser, William (Bill) Thomas McLaughlin, was sentenced to 6 years to life, followed by 10 years to life of parole for various counts of felony sexual assault on a child by a person in a position of trust.<sup>12</sup> He abused approximately 10-15 individuals, all of whom were expelled or in some fashion pushed out of the Denver ICOC as punishment for failing to comply with the leaders' commands.

113. Tomotaka ("Tom") Andrews Wilton of the Portland, Oregon ICC location raped a child<sup>13</sup> for years and church leaders, including McKean, were acutely aware of the abuse but did nothing to warn anyone regarding this despicable predator's presence. He was convicted in Idaho in 2009 of two counts of third-degree rape of a child and is now a registered sex offender. On information and belief, Mr. Wilton remains a member of the Portland ICC and is free to abuse other children.

#### Tomotaka Andrews Wilton Registration Details

Last Known Address: 2509 W BOISE AVE  
BOISE, ID 83706-2920  
ADA COUNTY, ID



DOB: 1971-11-04

Race:  
Asian Or Pacific  
Islander

Sex: Male

Eyes: Brown

Height: 5 ft 3 in

Hair: Brown

Weight: 173 lbs.

Tomotaka Andrews Wilton - Registered Sex Offender

[VIEW CRIMINAL RECORD](#)

#### Offense or Statute

Offense/Statute: Rcw 9a 44 079 Rape Of A Child In The Third Degree  
Charge Correlation Pending  
Date: 17 March 2009

<sup>12</sup> <https://castlerocknewspress.net/stories/denver-man-sentenced-in-douglas-county-for-sex-assault-on-child,117951>

<sup>13</sup> [http://www.isp.idaho.gov/sor\\_id/SOR?id=35071&sz=1360](http://www.isp.idaho.gov/sor_id/SOR?id=35071&sz=1360); <https://www.homefacts.com/offender-detail/IDSX35071/Tomotaka-Andrews-Wilton.html>



1 114. The active concealment and protection of known pedophiles was  
2 pervasive particularly in the Texas ICOC churches, which is consistent with an ethos  
3 that in Texas, “we don’t call 911”. Indeed, this slogan is branded on apparel and other  
4 retail items such as the following t-shirt and snow globe:



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115. There are at least 4 known pedophiles who were allowed to run rampant within the churches without any notification to the congregation that their children were in danger.

116. Karim Torres was convicted of indecency with a child by contact and on information and belief, he is currently a Bible talk leader and he has served several Texas ICOC locations. He and his wife are known to frequently visit other ICOC churches as speakers at family retreats.

Offense: INDECENCY WITH A CHILD BY CONTACT

Statute	TEXAS PENAL CODE 21.11(a)(1)
Victim Sex	Female
Victim Age	16
Disposition Date	07/19/1999
JUDGMENT	3YPROBATION/COMMUNITY SUPERVISION



Photo Reported - 04/10/2006



Photo Reported - 01/08/2001

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1 117. Warren Inman was convicted of at least three counts of indecency with a  
2 child in or about February 2021 in Denton County, Texas, Case No. F-2012-0728-D.  
3 He was a member of the Dallas ICOC and lives in Denton County. He was a worship  
4 leader and allowed college students to live in his home, as he regularly had college  
5 worship group meetings at his home. Mr. Inman has been in and out of prison and was  
6 finally arrested for child molestation. On information and belief, he was *not* reported to  
7 the police by ICOC.



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118. Joseph Ursini has multiple arrests and has been in and out of the ICOC fellowship over the years. On information and belief, none of the Texas ICOC churches, including the Dallas location, have reported Mr. Ursini's criminal conduct to the relevant authorities.



119. Luis Miguel Quiroz was the subject of several individuals' reports to ICOC regarding extreme sexual abuse of several minors. However, the church did nothing and he was finally arrested approximately 10 years after the reports were made to the church. Luis is the brother of Dr. Carlos Quiroz, an ICOC pediatrician.

Home » Texas Mugshots » Fort Bend County  
Mugshots » Quiroz, Luis Miguel Mugshot | 2017-07-05  
20:26:00 Fort Bend County, Texas Arrest



QUIROZ LUIS MIGUEL

ON 2017-07-05 20:26:00 FORT BEND COUNTY, TX MUGSHOTS

## SPECIFIC ALLEGATIONS

### The Abuse and Torture of Jane Roe 8

120. In 1996, when Jane Roe 8 was 3 years old and her parents were members of the East Region Los Angeles ICOC, she was molested by David Saracino, a regular Kids Kingdom worker and well liked ICOC member.

121. The molestation incident happened when Jane Roe 8 was in the Kids Kingdom ministry during a midweek church service. When Jane Roe 8 went home that evening, she told her mother that a man in Kids Kingdom had taken her into the closet, and did things to her “butt”, and her “private parts” hurt badly. Her mother talked with Jane Roe 8 about what happened and her mother was visibly upset and infuriated. Jane Roe 8’s mother immediately called the leaders of the East Region, Steve and Jacqueline Gansert-Morici. **Steve and Jacqueline asked her to not call the police to report the molestation of her 3-year-old daughter and said they first needed advice from the overseeing Elders, Bruce and Robin Williams.**

122. By 8:30 a.m. the next day, Jane Roe 8’s mother received a call from John Bringardner, a California attorney and ICOC ministry leader, who had been recently hired as General Counsel for ICOC. To Jane Doe 8’s mother’s complete surprise, **attorney John Bringardner warned her that reporting this type of child abuse to the police or authorities would be a “huge mistake,” and would further traumatize Jane Roe 8.** He explained that the police might remove the child from the home while the investigation was happening, and the child might be further molested while in foster care. He further reasoned that **disclosing the child molestation to the police could cause people to lose their faith and leave God’s true church.** John Bringardner manipulated Jane Roe 8’s mother into silence by also telling her, if the church endured a scandal and could not “make budget” as a result, she would lose her full-time job in the ministry and ultimately, the downfall of the church would be her fault.

123. Attorney John Bringardner framed his advice to Jane Roe 8’s mother as though he wanted to protect the family’s best interests and shield the child from

1 additional trauma. He also used guilt to silence Jane Roe 8's mother by making  
2 insulting statements, such as a "wise mother" would not subject her small child to a  
3 traumatic recounting of events that would inevitably occur after the authorities were  
4 notified.

5 124. Attorney John Bringardner concluded this conversation by promising to  
6 personally conduct an investigation regarding the abuse of Jane Roe 8.

7 125. The ensuing events were nothing short of a nightmare. Raul Dunn, the East  
8 Region Kids Kingdom leader and a non-staff layperson, called Jane Roe 8's mother and  
9 said, "We asked the two male Kids Kingdom workers, this question: 'Did you molest a  
10 kid last night in Kids Kingdom?'" The two male workers were the only male workers  
11 the day Jane Roe 8 was molested and, of course, they denied molesting Jane Roe 8.

12 126. Raul Dunn told Jane Roe 8's mother, "Your daughter was not molested,  
13 we asked the workers, and they said, no, so she must have been mistaken." Jane Roe  
14 8's mother was furious and when she inquired why no one was investigating her child's  
15 horrific abuse during a church service, Steve Gansert-Morici deflected and told her that  
16 he asked Raul Dunn to investigate the incident.

17 127. Attorney John Bringardner called Jane Roe 8's mother often for several  
18 weeks under the pretense of calling to "check on their family to see how they were  
19 doing." In reality, **he was keeping tabs on the family to ensure they never told**  
20 **anyone outside ICOC about Jane Roe 8's abuse at the hands of David Saracino.**

21 128. Jane Roe 8's mother requested an opportunity for her daughter to see both  
22 men and indicate which assaulted her, however, attorney John Bringardner refused the  
23 request and had no interest in learning which man horrifically abused the innocent child.  
24 Attorney John Bringardner said that since both brothers (i.e., the two male workers)  
25 swore they did not abuse Jane Roe 8, he was not comfortable subjecting them to such  
26 treatment. Jane Roe 8's mother was upset and disappointed with the church's inaction,  
27 so she created an opportunity for Jane Roe 8 to identify which "brother" molested her.  
28 That Sunday, Jane Roe 8 and her mother stood behind a two-way mirror at the East



1 Region Los Angeles ICOC building to try and identify her assailant, but Jane Roe 8  
2 became so nervous and fearful that she was unable to look at both men and buried her  
3 head in her mom's torso. As a result of her crippling fear, no definitive identification  
4 of the assailant was made, although Jane Roe 8 knew his identity at the time.

5 129. Jane Roe 8's mother relayed this development to Steve and Jacqueline  
6 Gansert-Morici. Steve responded in an "I told you so" manner, and ultimately **told her**  
7 **to forgive the man and move on.**

8 130. Defendants, and specifically, Attorney John Bringardner and Steve and  
9 Jacqueline Gansert-Morici bullied, intimidated and manipulated Jane Roe 8's parents,  
10 and convinced the family that reporting the crime to the authorities was wrong and  
11 would create eternal consequences.

12 131. On information and belief, Attorney John Bringardner asked both of the  
13 male workers, David Saracino and one other member, to visit the ICOC's downtown  
14 Los Angeles headquarters office and write formal statements regarding the incidents of  
15 that fateful day. Jane Roe 8's mother was never allowed to review their statements.

16 132. Five days after Jane Roe 8 was abused, her mother was at a church staff  
17 meeting in Hollywood at a church owned facility called the "Upside Down Club." After  
18 the staff meeting at the Upside-Down Club, she was called downstairs to participate in  
19 a meeting with attorney John Bringardner, Bruce and Robin Williams (ICOC Elders),  
20 and Steve and Jacqueline Gansert-Morici, to discuss the next steps in the ICOC led  
21 "investigation". The Gansert-Morici's were "discipled" by Bruce and Robin Williams,  
22 which meant the Gansert-Morici's answered to Bruce and Robin and sought their advice  
23 regarding all church related issues, including the molestation of Jane Roe 8. During the  
24 meeting, Kip McKean approached the group, isolated Jane Roe 8's mother and gave  
25 her a tight, seemingly compassionate hug. McKean stated that he was so proud of her  
26 for not going to the police, and made the statements:

27 "I'm so sorry for what you're going through, but **if the**  
28 **police get a hold of this story, they will twist this story**

1           **around and use it to destroy Gods church.** Then  
 2           innocent members of our church will lose their salvation.  
 3           I commend you for doing the Godly thing and allowing us  
 4           to handle it. On behalf of God’s church, I am grateful for  
 5           your faith sister, and I promise you that you did the  
 6           right thing here!” (emphasis added)

7           133. Approximately three weeks later, attorney John Bringardner  
 8           communicated to Jane Roe 8’s parents that because they reported the abuse to ICOC  
 9           leaders, significant changes were forthcoming in Kids Kingdom. Specifically, they  
 10          implemented a “2 adults always” rule whereby no one person was allowed to be alone  
 11          with a child during Kids Kingdom. **Attorney John Bringardner told Jane Roe 8’s**  
 12          **mother, “Because you did not contact the police, we were able to make the**  
 13          **Kingdom of God safer”.**

14          134. Jane Roe 8’s mother was deeply disturbed as the Gansert-Morici’s again  
 15          refused to warn the congregation about her daughter’s molestation, or to check in with  
 16          the other ICOC children in Kids Kingdom to determine if more abuse had occurred.

17          135. Approximately one year after Jane Roe 8’s abuse, another mother in the  
 18          Los Angeles East Region discovered that her child was also molested by David  
 19          Saracino and reported it to Steve Gansert-Morici and Rob and Connie Kosberg. Steve  
 20          suggested she call Jane Roe 8’s mother, presumably in hopes of Jane Roe 8’s mother  
 21          convincing the mother to refrain from reporting the abuse to the police.

22          136. Jane Roe 8’s family was utterly shocked and horrified to learn that David  
 23          Saracino abused another child. Jane Roe 8’s mother did not comply with Defendants’  
 24          “advice” to further manipulate this woman, and advised the woman to immediately  
 25          call the police because David Saracino had a history of abusing children in the church.

26          137. Because ICOC leaders refused to report David Saracino’s child abuse to  
 27          the authorities, this deplorable predator escaped to San Diego where he abused many  
 28          more children until he was eventually captured in 2005 after appearing on an episode  
 29          of America’s Most Wanted. **Defendants helped David Saracino evade authorities by**

1 **giving him refuge in various ICOC locations, and not alerting those congregations,**  
2 **thereby enabling him to continue abusing innocent children with impunity for 9**  
3 **years after Jane Roe 8 was molested.**

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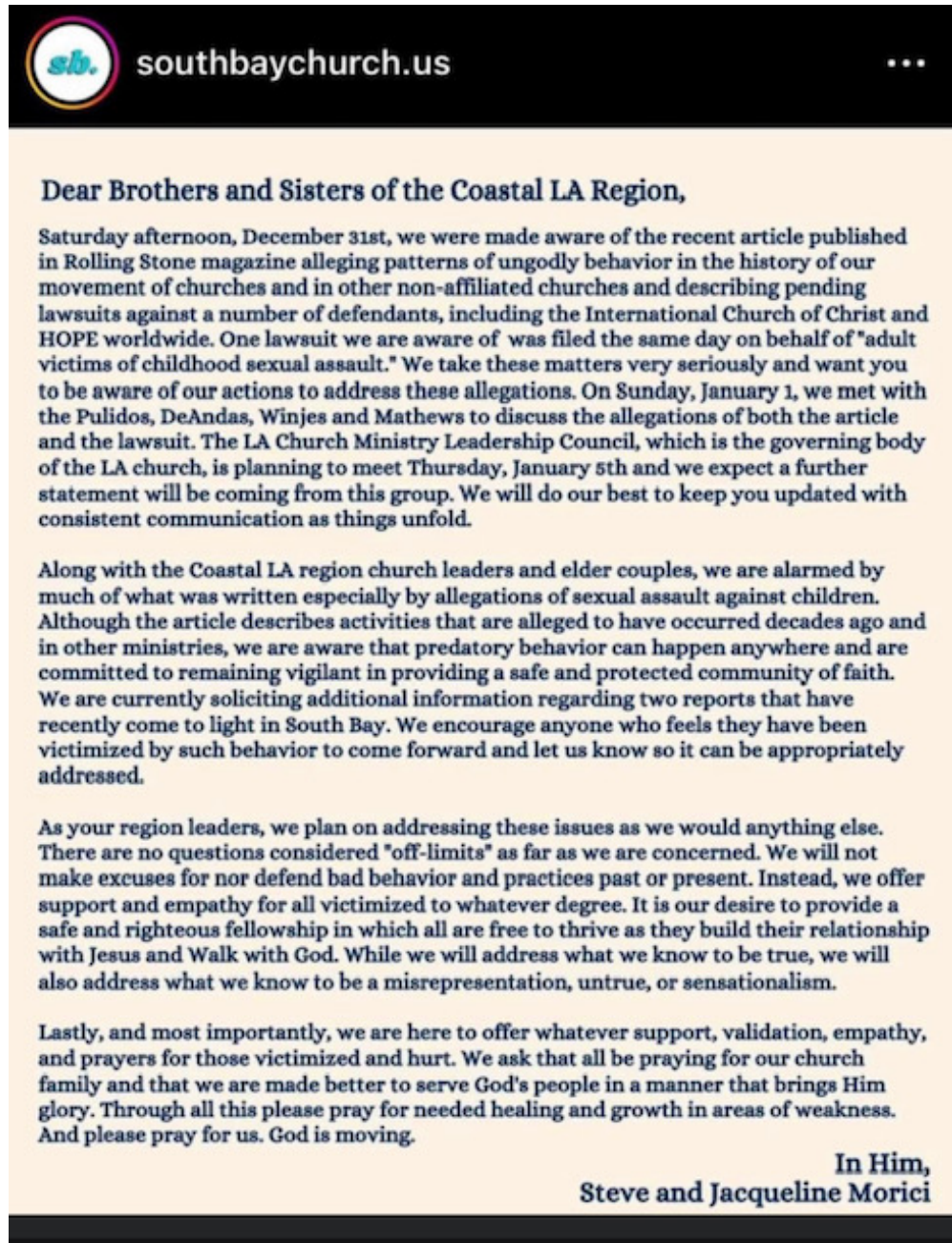
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138. After Defendants' pervasive sexual abuse was made public in a recent Rolling Stone Article<sup>14</sup>, Steve and Jacqueline Gansert-Morici issued a public statement to the South Bay Region of the LA ICOC, alleging they were unaware of any past or present "alleged" sexual abuse cases, and that the cases reported happened in "other" ministries of the ICOC. The following is a true and correct copy of Steve and Jacqueline Gansert-Morici's statement:



<sup>14</sup> <https://www.rollingstone.com/culture/culture-news/international-churches-of-christ-cult-sexual-abuse-indoctrination-pyramid-scheme-lawsuit-1234654868/>

1           139. Jane Roe 8's family and other past and present ICOC members know that  
2 several people *directly* reported sexual abuse incidents to Steve and Jacqueline Gansert-  
3 Morici. The Gansert-Morici's have feigned ignorance of years of abuse at their location  
4 to protect the church's tarnished image and perpetuate the systemic deception and  
5 concealment of child abuse within the entire ICOC family.

6           140. Jane Roe 8 has suffered in silence more than two decades and she has been  
7 in and out of therapy and/or counseling her entire life. These incidents not only affected  
8 Jane Roe 8 deeply, but also Jane Roe's mother who has suffered the secondary abuse  
9 of having to fight for her child's rights.

10           141. As a direct and proximate result of Jane Roe 8's abuse, she has suffered  
11 and continue to suffer a litany of injuries. Among other injuries, Jane Roe 8 has  
12 experienced and will continue to experience for the rest of her life, include severe pain  
13 and suffering, emotional distress, humiliation, mental anguish, loss of enjoyment of  
14 life, loss of educational opportunity, loss of wages, loss of income, and loss of future  
15 wages.

16 **The Abuse and Torture of Joana Diaz**

17           142. Joana Diaz ("Joana") is a 29-year-old woman who suffered abuse at both  
18 ICOC and ICC when she was a child. She first attended ICOC services in the mid  
19 1990's when she was approximately 3 years old.

20           143. Joana was first groomed by an ICOC member named Alfredo Alanis when  
21 she was 9 years old in Montebello, California. At the time, her mother and father  
22 needed childcare for her and her one-year-old brother while the parents attended ICOC  
23 events. Alfredo and his wife, Rosy, were in the same ministry as Joana's family in  
24 Montebello. Joana's parents decided to allow Rosy to care for the two children, as Rosy  
25 had a one-year-old child of her own at the time and she needed the flexibility of  
26 working from home.

27           144. Eventually Alfredo and his family moved into the same 4-unit apartment  
28 complex as Joana's family and the two families instantly became neighbors. By this



1 time, Joana had come to trust Alfredo and Rosy, as she routinely spent time at their  
2 house watching movies and generally spending recreation time with both of them.  
3 Alfredo often helped Joana with her homework and school projects when her parents  
4 did not help or when they did not have the time to help. Joana preferred being at the  
5 Alanis house, as she did not have a good relationship with her mother and she felt like  
6 she received more attention at the Alanis house. Alfredo and Rosy became best friends  
7 with Joana's parents.

8 145. The first time Joana noticed something that made her feel uncomfortable  
9 was when she was 9 years old and she was asked to watch Rosy and Alfredo's son on  
10 a Saturday morning while he slept so Rosy could attend Bible study and Alfredo could  
11 attend a soccer game. Joana's mother woke her up Saturday morning around 6 a.m.  
12 and she went downstairs to the Alanis apartment unit. When she arrived, Rosy had  
13 already left home, the baby was asleep in Rosy and Alfredo's bedroom and Alfredo  
14 was almost ready to leave for the soccer game.

15 146. Since it was very early and she was still half asleep, Alfredo told Joana to  
16 get in the bed so she could hear when the baby woke up in his crib. Without thinking  
17 she climbed in bed and snuggled under the covers to get comfortable so she could go  
18 back to sleep. Suddenly **Alfredo, a man in his late 30's, got into bed with Joana,**  
19 **spooned her, put his leg over her and hugged her tightly.** Unsure of how to react,  
20 she froze and pretended to be asleep. He spooned her for what felt like an eternity  
21 before he finally left for the soccer game. Joana felt something hard behind her, which  
22 she now knows as an adult, was Alfredo's erection.

23 147. In 2004, when Joana was approximately 11 years old, her family moved  
24 to Gresham, Oregon to join Kip McKean's new church, ICC. Alfredo, Rosy and his  
25 family also moved to Gresham. Joana recalls numerous instances of Alfredo touching  
26 her inappropriately under the guise of an "accident" or "tickling", such as when he  
27 would touch or tickle her chest and thighs.

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1           148. Around the age of 12, Alfredo's abuse escalated after he once again  
2 became her neighbor in Gresham. What Joana has now become aware of, through  
3 information and belief, is that Alfredo's relocations to the same apartment complexes  
4 as Joana's family were calculated to give Alfredo constant access to Joana and so he  
5 could continue grooming the child.

6           149. Alfredo followed her everywhere she went and whenever Alfredo knew  
7 she was home alone, he called her to talk on the phone. He repeatedly tried to bait  
8 Joana into discussing inappropriate and intimate matters. Joana lied and told Alfredo  
9 that her parents told her not to answer the phone while they were not home because his  
10 unwanted phone calls made her incredibly uncomfortable. To circumvent this rule,  
11 Alfredo told her that she would know it was him calling because he would call and let  
12 the phone ring 3 times, hang up and call again. Joana felt like she had no choice but to  
13 comply with this adult's instructions. **Alfredo tried talking to her on the phone for**  
14 **at least an hour on each call**, and he often ended the calls by telling her that he loved  
15 her and he forced her to say it back. On some occasions, he invited himself to Joana's  
16 family home while her parents were away, under the pretext of having a playdate with  
17 his son and Joana's two siblings. Joana hated these "playdates", as they always made  
18 her feel extremely unsafe around him.

19           150. Alfredo's pursuit of Joana heightened, as he began knocking on her  
20 bedroom window every night to say goodnight. One night, Rosy caught him in this  
21 bedtime ritual and she was furious with Alfredo and 12-year-old Joana.

22           151. Alfredo smoothed things over with Rosy, but took additional measures to  
23 conceal the nature and extent of his harassment of Joana. One day around her birthday,  
24 she was startled awake by his presence in her bedroom. Alfredo said he bought her  
25 some birthday gifts and wanted to give them to her privately. While she was opening  
26 her gifts, **Alfredo boldly asked her if he could kiss her on the lips**. After having his  
27 sexual advance rejected by the child, Alfredo pulled out a Hershey's kiss and pretended  
28 that he was referring to that instead of a physical kiss.

1           152. After Alfredo's failed bedroom kiss incident on Jane Roe's 13th birthday,  
2 Alfredo began calling Joana by phone more frequently when he knew her parents were  
3 not home. On one occasion, he parked his car a couple blocks from the house and  
4 jumped the neighbors gate to get to Joana's backyard without his wife noticing. He  
5 called Joana and asked her to open the back door for him and she reluctantly  
6 acquiesced. **Alfredo confessed his love for Joana, forcibly kissed her and savagely**  
7 **molested her in her parent's bedroom (adjacent to the back door).** Stunned and  
8 scared, Joana froze in terror, as she was confused and did not know how to react or  
9 what she should do. After he left, she felt dirty and brushed her teeth aggressively to  
10 eliminate all traces of the man who had just done horrible things to her. Joana recalls  
11 thinking at the time that she wanted to shower with bleach to clean herself. Like many  
12 sexual assault survivors, Joana felt ashamed of what happened, as if she was to blame  
13 for Alfredo's despicable abuse. She did not dare tell her parents what happened for fear  
14 of being accused of causing the abuse.

15           153. The next day, Alfredo went to Joana's home and acted as though nothing  
16 happened the night before. This made Joana sick to her stomach and she treated Alfredo  
17 very coldly as a result.

18           154. Two days after the bedroom molestation incident, Alfredo followed Joana  
19 to school in his car as she walked on the sidewalk. She tried ignoring him, but he  
20 continued following her and asking her to get in his car. Embarrassed because Alfredo  
21 was causing a scene in front of other students, she angrily got into his car. Alfredo told  
22 Joana that she should skip school and spend the day with him. He offered to take her  
23 to the movies and to Olive Garden for lunch, but she declined and said she needed to  
24 go to school. **Alfredo again confessed his love for Joana and said he wanted to run**  
25 **away with her.** She asked about his wife and son, but Alfredo said they did not matter.  
26 Joana declined the offer, jumped out of the car and ran to her bus stop. Little did Joana  
27 know at the time, but when Alfredo proposed "running away together", he actually  
28 meant that he would kidnap Joana and take her away from her family.

1           155. Later that day after she exited the bus from school and was walking with  
2 a friend, the friend pointed out that a man was following them in a car and he was  
3 calling Joana's name. **Alfredo was the man following the girls home from school.**  
4 Joana stopped and talked to Alfredo, but she did not get into his car out of sheer fear  
5 of her abuser. He told her that his offer to spend the day together was still open and he  
6 asked her to get into the car. She said no thank you and frantically rushed home as fast  
7 as she could, uncertain if he would continue following her or if he was going to abuse  
8 her again.

9           156. After years of grooming, Joana was so afraid of Alfredo and his new  
10 stalking behavior that she did not go to school for several days after he followed her  
11 and her friend home from school. She pretended to go to school so her parents were  
12 not alerted, but she left the garage door ajar enough to slide her little body in the crevice  
13 and get back inside. She was so frightened and disturbed by Alfredo that she hid under  
14 her bed all day until it was time for her to "come back from school," which she faked  
15 by going out through the garage and then walking through the front door with her  
16 backpack on.

17           157. Thereafter, Joana would pretend to be upset about something, anything,  
18 to avoid going to Alfredo's house. This evasive tactic worked for a short time, but  
19 Joana's father eventually accused her of being selfish and forced her to make amends  
20 with Alfredo's family.

21           158. When she was 13 years old, Joana's parents were selected by McKean  
22 and other ICC leaders to participate in a mission team back to Los Angeles, however,  
23 Alfredo's family was not chosen. Joana was overjoyed to finally be free of Alfredo!

24           159. By the time Joana was 20 years old, her parents were planning to move  
25 back to Gresham with Joana and their 5-year-old daughter. Joana fiercely protested and  
26 eventually disclosed the myriad of abuse she suffered at Alfredo's hands over the years.  
27 She could not have forgiven herself if Alfredo abused her little sister too.

28 ///

1           160. After learning of the abuse for the first time, Joana's mother was outraged  
2 and she immediately contacted her ICC "disciplers", Sal and Patty Velasco, to discuss  
3 the matter. Shortly thereafter, Kip and Elena McKean became involved and they  
4 offered to have Alfredo call Joana and her family to "apologize," as the only remedy  
5 for all the abuse, which the family declined.

6           161. Sal and Patty Velasco told Joana's mother that nothing would be done and  
7 there was nothing they could do either, because ICC and McKean had more money and  
8 better lawyers than Joana's family could afford, and their family would surely lose the  
9 case.

10           162. On information and belief, **Alfredo Alanis is currently a respected**  
11 **leader in charge of the ICC Latin Ministry in Portland, Oregon.**

12           163. As a result of Alfredo's abuse and the widespread church-sanctioned  
13 cover up, Joana suffers from flashbacks of her abuse and anxiety, among other things.  
14 She has endured emotional and psychological challenges over the years as she has  
15 attempted to cope with this substantial trauma on her own.

16           164. As a direct and proximate result of Jane Roe 9's abuse, she has suffered  
17 and continue to suffer a litany of injuries. Among other injuries, Jane Roe 9 has  
18 experienced and will continue to experience for the rest of her life, include severe pain  
19 and suffering, emotional distress, humiliation, mental anguish, loss of enjoyment of  
20 life, loss of educational opportunity, loss of wages, loss of income, and loss of future  
21 wages.

22                           **FIRST CLAIM FOR RELIEF**  
23                           **SEXUAL ASSAULT OF A MINOR**  
24                           *(Against All Defendants and Does 1-100)*

25           165. Plaintiffs re-allege and incorporate by reference herein each and every  
26 allegation contained herein above as though fully set forth and brought in this cause of  
27 action.

28           ///

1       166. Defendants intentionally, willfully, and maliciously sexually assaulted  
2 and/or sexually abused and molested Plaintiff during the time that Plaintiff was a  
3 minor.

4       167. In committing the unlawful acts of sexual assault against Plaintiff,  
5 Defendants intended to put Plaintiff in imminent apprehension of harmful or offensive  
6 contact.

7       168. Defendants put Plaintiffs in imminent apprehension of such harmful  
8 offensive contact as Plaintiffs actually believed Defendants had the ability to make  
9 harmful or offensive contact with plaintiff's person.

10       169. Plaintiffs did not consent to Defendants' intended harmful or offensive  
11 contact with plaintiff, Defendants' intention to put Plaintiffs in fear of imminent  
12 apprehension of such contact, plaintiff was a minor during the time herein alleged and,  
13 therefore, lacked the ability to consent to sexual contact with any person, including  
14 Defendants.

15       170. As a direct and legal result of this conduct. Plaintiffs suffered harm  
16 including, but not limited to, physical, mental, and emotional injuries of childhood  
17 sexual abuse and molestation; was caused to incur medical and other expenses for care,  
18 treatment, and counseling, and Plaintiffs will continue to incur all such damages in the  
19 future, and other damages, in an amount not yet ascertained, but which exceed the  
20 minimum jurisdictional limits of this Court.

21       171. Defendants conduct described herein was oppressive, malicious, and  
22 despicable in that it was intentional and done in conscious disregard for the rights and  
23 safety rights of Plaintiffs, and with the substantial certainty that it would cause  
24 Plaintiffs, to suffer humiliation, mental anguish, and emotional and physical distress.

25       172. Defendants' conduct as alleged constitutes malice and oppression under  
26 California Civil Code section 3294. Plaintiffs are therefore entitled to the recovery of  
27 punitive damages in an amount to be determined by the Court.

28       ///

**SECOND CAUSE OF ACTION**  
**VIOLATION OF PENAL CODE 647.6(a)(1)**  
*(Against All Defendants and Does 1-100)*

173. Plaintiffs re-allege and incorporate by reference herein each and every allegation contained herein above as though fully set forth and brought in this cause of action.

174. California Penal Code § 647.6(a)(1) provides that "[every person who aims or molests any child under 18 years of age shall be punished by a fine not exceeding five thousand dollars (\$5,000), by imprisonment in a county jail not exceeding one year, or by both the fine and imprisonment."

175. As alleged herein, Defendants engaged in sexual penetration with Plaintiffs while Plaintiffs were under eighteen years of age, in violation of California Penal Code § 647.6(a)(1).

176. Under California law, victims of childhood sexual abuse are entitled to bring civil actions for violations of Penal Code provisions that prohibit adults from engaging in sexual acts with minors, including Penal Code § 647.6(a)(1). See *Angie M. v. Superior Court*, (1995) 37 6 Cal.App.4th 1217, 1224-1225.

177. Defendants above-noted actions in annoying and molesting the minor Plaintiffs was the proximate and legal causes of physical, psychological, emotional, and economic damages Plaintiffs have suffered and continues to suffer to this day. It also has resulted in Plaintiffs incurring, and will require Plaintiffs to incur into the future, expenses for medical and psychological treatment, therapy, and counseling.

178. The above-described conduct of Defendants was oppressive, malicious and despicable in that it was intentional and done in conscious disregard for the rights and safety of Plaintiffs, and was carried out with a conscious disregard of Plaintiffs right to be free from such tortious behavior, such as to constitute oppression, fraud or malice pursuant to California Civil Code section 3294, entitling Plaintiffs to punitive damages against Defendants in an amount appropriate to punish and set an example of



1 them.

2 **THIRD CAUSE OF ACTION**  
3 **INTENTIONAL INFLICTION OF EMOTIONAL DISTRESS**  
4 *(Against All Defendants and Does 1-100)*

5 179. Plaintiffs re-allege and incorporate by reference herein each and every  
6 allegation contained herein above as though fully set forth and brought in this cause of  
7 action.

8 180. The conduct of all Defendants as set forth in this Complaint was extreme  
9 and outrageous, and committed with the intention of causing, or reckless disregard of  
10 the probability of causing, emotional distress.

11 181. A reasonable person would not expect or tolerate the sexual assault  
12 committed by Defendants.

13 182. A reasonable person would not expect, accept or tolerate Defendants'  
14 unlawful sexual assault and/or sexual abuse, and molestation of Plaintiffs.

15 183. Defendants' conduct exceeded all bounds of that usually tolerated in a  
16 civilized community.

17 184. Defendants intended to cause Plaintiffs injury when they sexually  
18 assaulted Plaintiffs, manipulated and brainwashed Plaintiffs into silence and actively  
19 concealed Plaintiffs' abuse.

20 185. Plaintiffs have suffered severe and/or extreme distress as a result.

21 186. As a direct and legal result of Defendants' conduct, Plaintiffs suffered  
22 harm including, but not limited to, physical, mental, and emotional injuries of  
23 childhood sexual abuse and molestation; was caused to incur medical and other  
24 expenses for care, treatment, and counseling, and Plaintiffs will continue to incur all  
25 such damages in the future, and other damages, in an amount not yet ascertained, but  
26 which exceed the minimum jurisdictional limits of this Court.

27 187. Defendants' conduct described herein was oppressive, malicious and  
28 despicable in that it was intentional and done in conscious disregard for the rights and

1 safety rights of Plaintiffs, and with the substantial certainty that it would cause  
2 Plaintiffs, to suffer humiliation, mental anguish and emotional and physical distress.

3 188. Defendants' conduct as alleged constitutes malice and oppression under  
4 California Civil Code section 3294. Plaintiffs are, therefore, entitled to the recovery of  
5 punitive damages, in an amount to be determined by the Court.

6 **FOURTH CAUSE OF ACTION**  
7 **NEGLIGENT HIRING, SUPERVISION, AND RETENTION**  
8 *(Against All Defendants and Does 1-100)*

9 189. Plaintiffs re-allege and incorporate by reference herein each and every  
10 allegation contained herein above as though fully set forth and brought in this cause of  
11 action.

12 190. At all times relevant, a special relationship existed between Defendants  
13 and Defendants, because Defendants were the agents of Defendants, each of whom had  
14 the ability to control of Defendants' conduct, yet failed to exert it. In doing so,  
15 Defendants created a widespread culture of acceptance of the abuse of children, as  
16 Defendants and Defendants collectively brainwashed and manipulated Plaintiffs to  
17 remain silent about the abuse and these Defendants also actively concealed the abuse  
18 to avert discovery by the authorities.

19 191. At all times herein. Defendants, and each of them, negligently supervised,  
20 managed, and controlled Defendants in their membership and participation in  
21 Defendants' Church, and negligently failed to warn Plaintiffs, Plaintiffs' parents, and  
22 other members of the Church, of the propensity and risk that Defendants would  
23 sexually assault, sexually abuse, and/or molest minor children, a propensity and history  
24 of which Defendants, and each of them, acting through their employees, agents, and  
25 volunteers, had actual notice.

26 During the same time period, Defendants, and each of them, were negligent in failing  
27 to exercise reasonable care to protect Plaintiffs, and other minors, who were members  
28 of, or participants in, activities at Defendants' Church, from the risk of sexual assault,

1 sexual abuse and molestation by perpetrators, including Defendants.

2 192. Defendants were further negligent in failing to notify law enforcement  
3 and other appropriate authority that Plaintiffs were and/or continued to be a victim of  
4 child abuse/assault by Defendants when they learned of this fact. Defendants' failure  
5 to report the known and/or reasonably suspected child abuse of Plaintiffs, but instead  
6 Defendants perpetuated and facilitated Defendants' continued sexual abuse and/or  
7 sexual assault, and molestation of Plaintiffs.

8 193. If Defendants satisfied their duty to take reasonable steps to protect  
9 Plaintiffs all minor children, from known and/or foreseeable harm, including sexual  
10 assault, including reporting the sexual assault and/or sexual abuse, and molestation to  
11 law enforcement, then some or all of the Plaintiff's injuries would have been avoided.

12 194. Prior to, during, and after the sexual assault of Plaintiffs, Defendants,  
13 through their administrators, employees, agents, and/or volunteers, had knowledge,  
14 and/or were otherwise on notice, that Defendants had and/or was engaged in, and/or  
15 presented the risk of, sexual assault of Plaintiffs, and other minors.

16 195. Plaintiffs are informed, believes, and thereupon alleges that prior to, and  
17 during Defendants' sexual assault and/or sexual abuse, and molestation of Plaintiffs,  
18 Defendants knew or should have known, reasonably suspected, and/or were otherwise  
19 on notice, of Defendants' unlawful conduct, as set forth in this Complaint, but failed  
20 and/or refused to take any affirmative action, including but not limited to notifying law  
21 enforcement. Instead, Defendants directed Plaintiffs and Plaintiffs' parents to continue  
22 to have contact with Defendants thereby ratifying and facilitating Defendants'  
23 continued sexual assault and/or sexual abuse and molestation of Plaintiffs.

24 196. Defendants breached their duties by failing to use reasonable care to  
25 protect Plaintiffs from their pastor, deacon, employee, and/or agent, to wit, Defendants.

26 197. If Defendants fulfilled their duty and responsibility, then Plaintiffs would  
27 not have been subject to all or most of the misconduct perpetrated against her and the  
28 resulting harm.



1           203. Defendants and Church Leader Defendants, and each of them, breached  
2 their duty to properly and adequately supervise, monitor, and protect Plaintiffs, in part  
3 because officers, administrators, agents, and other supervisory employees knew or  
4 should have known of Defendants' improper behavior, including that minor children,  
5 including Plaintiffs, were frequently alone with Defendants without any justification,  
6 that Defendants would frequently touch and sexually abuse minor children, including  
7 Plaintiffs, at Church Leader Defendants and Defendants' Churches without any  
8 justifiable reason for doing so, including when the minor children were by themselves,  
9 and Defendants sexually abused, assaulted, and/or molested minor children, including  
10 but not limited to Plaintiffs.

11           204. Defendants and Church Leader Defendants, acting through their  
12 administrative and supervisory employees, knew or should have known that Plaintiffs  
13 were unattended and unsupervised with Defendants on numerous occasions, without  
14 any justification.

15 It should have been obvious to any officer, agent, administrator, employee, or staff  
16 member that there was no reason that neither Plaintiffs, nor any other child, should  
17 have been alone with Defendants. The employees and agents of Defendants and Church  
18 Leader Defendants instead turned a blind eye to the fact that Defendants were spending  
19 time with minor children, including Plaintiffs, unattended and unsupervised without  
20 any investigation into the matter.

21           205. After engaging in grooming activity of Plaintiffs while spending time  
22 alone with Plaintiffs, Defendants started sexually assaulting, sexually abusing, and  
23 molesting Plaintiffs and other minor children on Defendants' premises and during  
24 Defendants and Church Leader Defendants' church related services. The acts of sexual  
25 assaults and abuse occurred while Plaintiffs were left unattended and unsupervised  
26 with Plaintiffs.

27           206. If Defendants and Church Leader Defendants, and each of them,  
28 adequately and properly supervised, monitored, and protected Plaintiffs, Plaintiffs

1 would not have been harmed, or would not have been harmed to the extent that  
2 Plaintiffs were.

3 207. Defendants and Church Leader Defendants, and each of them, also  
4 recklessly and negligently failed to implement and/or enforce policies and procedures  
5 that were aimed at preventing or detecting sexual assault and assault of their minor  
6 members.

7 208. If Defendants and Church Leader Defendants, and each of them,  
8 adequately performed their duties and responsibilities, then Plaintiffs would not have  
9 been subject to the sexual assault, assault and harassment perpetrated by the  
10 Defendants.

11 209. Plaintiffs have been severely damaged emotionally and physically, and  
12 otherwise, in amounts to be proven at the time of trial, but which exceed the  
13 jurisdictional limits of the Superior Court as a direct and legal result of the acts and  
14 omissions of Defendants and Church Leader Defendants, and each of them.

15 **SIXTH CAUSE OF ACTION**  
16 **FAILURE TO REPORT SUSPECTED CHILD ABUSE IN VIOLATION**  
17 **OF PENAL CODE SECTION 11165. ET SEP. BASED ON VICARIOUS**  
18 **LIABILITY**

*(Against All Defendants and Does 1-100)*

19 210. Plaintiffs re-allege and incorporate by reference herein each and every  
20 allegation contained herein above as though fully set forth and brought in this cause of  
21 action.

22 211. Defendants and Church Leader Defendants, through their administrators  
23 and employees knew or reasonably suspected that Defendants had, and or was, engaged  
24 in the sexual assault of children while the children were under the care, custody, and  
25 supervision of Defendants, and each of them, and thus had a duty to report Defendants  
26 to the appropriate authorities under the California Child Abuse and Neglect Reporting  
27 Law. (Penal Code §§ 11164-11174.3, "CANRA".)

28 212. At all times relevant herein and material hereto, Defendants were



1 employees of Defendants and Church Leader Defendants. Defendants and Church  
2 Leader Defendants were responsible for hiring, training, supervising, and retaining  
3 Defendants as part of their church and youth bible studies program. Defendants and  
4 Church Leader Defendants' staff, employees, and administrators were required to  
5 report any suspected child or sexual abuse as part of their duties and responsibilities as  
6 employees and/or agents of Defendants and Church Leader Defendants.

7 213. Defendants' and Church Leader Defendants' administrators, board  
8 members, and employees are mandated reporters under Penal Code section 11165.7.

9 214. Penal Code section 11166(a) states that a mandated reporter shall make a  
10 report to an agency whenever he/she, in his/her professional capacity or within the  
11 scope of his/her employment, has knowledge of or observes a child whom the  
12 mandated reporter knows, or reasonably suspects has been a victim of child abuse or  
13 neglect. "Reasonable suspicion" does not require certainty that child abuse or neglect  
14 has occurred but looks to if it is objectively reasonable for a person to entertain a  
15 suspicion to suspect child abuse or neglect. (Penal Code § 11166(a)(1).)

16 215. As set forth in this Complaint, Defendants and Church Leader  
17 Defendants, through their administrators, board members, and employees knew and/or  
18 reasonably suspected that children had been sexually assaulted by Defendants, prior to  
19 Defendants' sexual assault of Plaintiffs, giving rise to a duty to report such conduct  
20 under CANRA.

21 216. Defendants and Church Leader Defendants, through their administrators,  
22 board members, and employees knew that in the absence of the exercise of reasonable  
23 diligence, that an undue risk to minors, including the Plaintiffs, existed because  
24 Defendants' administrators, board members, and/or employees did not comply with  
25 California's mandatory reporting requirements.

26 217. Defendants, through their administrators, board members, and employees,  
27 including but not limited to and Church Leader Defendants, failed to report the known  
28 and/or reasonably suspected child molestations and assaults, created the risk and

1 danger contemplated by CANRA, and a result, unreasonably and wrongfully exposed  
2 Plaintiffs and other minors to sexual molestation and abuse,

3 218. If Defendants, through their administrators, board members, and  
4 employees, including but not limited to the Church Leader Defendants, complied with  
5 CANRA's mandatory reporting requirements, then Plaintiffs would not have been  
6 harmed at all or to the extent that she was.

7 219. As a direct result of Defendants and Church Leader Defendants' failure  
8 to comply with CANRA's mandatory reporting requirements, through their  
9 administrators, board members, and employees. Defendants and Church Leader  
10 Defendants wrongfully denied the Plaintiffs the intervention of child protection  
11 services and constituted a per se breach of Defendants, through their administrators,  
12 board members, and employees, duties to Plaintiffs.

13 220. As a direct and legal result of Defendants and Church Leader Defendants'  
14 conduct, Plaintiffs suffered severe and permanent injuries including, but not limited to,  
15 physical and mental pain and suffering, severe emotional distress, physical injuries,  
16 past and future costs of medical care and treatment, and other damages, in an amount  
17 not yet ascertained, but which exceed the minimum jurisdictional limits of this Court.

18 **SEVENTH CAUSE OF ACTION**  
19 **NEGLIGENCE**

20 *(Against All Defendants and Does 1-100)*

21 221. Plaintiffs re-allege and incorporate by reference herein each and every  
22 allegation contained herein above as though fully set forth and brought in this cause of  
23 action.

24 222. Defendants owed a duty of care to the minor Plaintiffs or had a duty to  
25 control the conduct of Defendants by way of the special relationship existing between  
26 those individuals and Plaintiffs.

27 223. Defendants knew or should have known, reasonably suspected, and/or  
28 were otherwise on notice, of the misconduct and sexually predatory behavior of the

1 Defendants directed towards minor children, including Plaintiffs.

2 224. Despite having knowledge of the misconduct of Defendants, all  
3 Defendants herein failed to take any preventative action to control, curb, and/or prevent  
4 that conduct, failed to warn Plaintiffs or Plaintiffs' parents of that wrongful conduct,  
5 and/or failed to notify law enforcement, despite having a legal duty to do so.

6 225. As a direct and legal result of Defendants' negligence, Plaintiffs were  
7 sexually assaulted, sexually abused, sexually harassed, and assaulted by the  
8 Defendants.

9 226. If Defendants fulfilled their duty and responsibility, then Plaintiffs would  
10 not have been subject to all or most of the misconduct perpetrated against Plaintiffs  
11 and the resulting harm.

12 227. As a direct and legal result of Defendants' conduct, Plaintiffs suffered  
13 severe and permanent injuries including, but not limited to, physical and mental pain  
14 and suffering, severe emotional distress, physical injuries, past and-future costs of  
15 medical care and treatment, and other damages, in an amount not yet ascertained, but  
16 which exceed the minimum jurisdictional limits of this Court.

17 **EIGHTH CLAIM FOR RELIEF**  
18 **Violation of Federal Racketeer Influenced and Corrupt Organization ("RICO")**  
19 **Act 18 U.S.C. § 1962(c)**  
20 *(Against All Defendants and Does 1-100)*

21 228. Plaintiffs re-allege and incorporate by reference herein each and every  
22 allegation contained herein above as though fully set forth and brought in this cause of  
23 action.

24 229. Plaintiffs bring this claim for relief under the private cause of action  
25 provided by 18 U.S.C. § 1984(c), which prohibits violations of the Federal RICO Act  
26 insofar as such violation injures any person in his business or property.

27 230. Defendants are "persons" within the meaning of 18 U.S.C. § 1961(3) who  
28 conducted the affairs of the enterprise through a pattern of racketeering activity in  
violation of 18 U.S.C. § 1962(c).

1           231. The Abuse Enterprise, distinct from Defendants, is an association-in-fact  
2 within the meaning of 18 U.S.C. § 1961(4), organized within individual ministries,  
3 funneling into regions governed by individual bishops, and headquartered in Los  
4 Angeles, California. Members of the Abuse Enterprise maintain a common purpose  
5 of extracting money from its members and perpetrating sexual abuse upon minor  
6 children under the auspices of liturgical praxis and writings taught by its church  
7 ministers worldwide. The Abuse Enterprise began as early as 1979 and continues with  
8 a growing global membership of more than 120,000 today.

9           232. Defendants have conducted and participated in the affairs of the Abuse  
10 Enterprise through a pattern of racketeering activity within the meaning of 18  
11 U.S.C. §§ 1961(1) and 1961(5).

12           233. Defendants' pattern of racketeering activity includes, but is not limited to,  
13 many repeated occurrences of the following predicate acts: sexual exploitation of  
14 minors and the transmission of visual depictions of minors engaged in sexually explicit  
15 conduct in violation of 18 U.S.C. §§ 2251, 2252, and 2260.

16           234. Each Defendant, in their individual capacity, knew or should have known  
17 about the majority of the predicate acts carried out by Defendants within the Abuse  
18 Enterprise.

19           235. Upon information and belief, some combination of Defendants have  
20 engaged in an uninterrupted course of unlawful conduct consisting of all of the herein  
21 described predicate acts.

22           236. Defendants' pattern of racketeering activity includes, but is not limited to,  
23 many repeated occurrences of the following predicate acts: (i) violating the prohibition  
24 against human trafficking under 18 U.S.C. § 1590; (ii) laundering of monetary  
25 instruments outside of the United States with the intent to promote the carrying on of  
26 unlawful activity in violation of 18 U.S.C. § 1956(a)(2); and (iii) sexual exploitation of  
27 minors and the transmission of visual depictions of minors engaged in sexually explicit  
28 conduct in violation of 18 U.S.C. §§ 2251, 2252, and 2260 Upon information and

1 belief, several hundred children have been sexually exploited as a result of this pattern  
2 of racketeering behavior.

3 237. Upon information and belief, hundreds of individuals within Defendants'  
4 inner circles have been extorted through fear of financial and physical injury into  
5 making large financial payments to Defendants and into providing sexual services to  
6 Defendants as a result of this pattern of racketeering behavior.

7 238. Upon information and belief, many millions of dollars have been  
8 trafficked out of the United States for the purposes of carrying on unlawful activity as  
9 a result of this pattern of racketeering behavior.

10 239. Upon information and belief, Defendants' pattern of racketeering  
11 behavior has been related and continuous since its inception. Upon information and  
12 belief, there is not only a threat of continued criminal activity, but continued criminal  
13 activity is occurring within the Abuse Enterprise at the hands of nearly all Defendants  
14 as of the writing of this Complaint.

15 240. Defendants and the Abuse Enterprise regularly move goods, money, and  
16 people across state lines, and are therefore engaged in interstate commerce.

17 241. As a direct and proximate result of these patterns of racketeering  
18 behaviors, Plaintiffs have sustained damages, including lost wages, loss of economic  
19 opportunity, loss of educational opportunity, loss of future income, loss of specific  
20 extorted payments, physical injury, severe emotional distress, and additional economic  
21 losses.

22 242. Plaintiffs are therefore entitled to recover treble the damages she sustained  
23 in an amount to be proven at trial, the cost of the suit, plus a reasonable attorney's fee,  
24 pursuant to 18 U.S.C. § 1964(c).

25 ///

26 ///

27 ///

28 ///

**NINETH CLAIM FOR RELIEF**

**Sexual Battery in Violation of Cal. Civ. Code § 1708.5**

*(Against All Defendants and Does 1-100)*

243. Plaintiffs re-allege and incorporate by reference herein each and every allegation contained herein above as though fully set forth and brought in this cause of action.

244. Plaintiffs bring this claim for relief under Cal. Civ. Code Section 1708.5, which prohibits sexual battery.

245. Plaintiffs bring this claim pursuant to California Assembly Bill 218, amending Sections 340.1 and 1002 of the Code of Civil Procedure and Section 905 of the Government Code, relating to childhood sexual assault, reviving until December 31, 2023 the statute of limitations for all previously extinguished claims for damages suffered as a result of childhood sexual assault for victims within 22 years of the age of majority.

246. As alleged herein, Plaintiffs the victim of sexual battery as a minor perpetrated by Defendants. Defendants subjected Plaintiffs to this sexual battery at the hands of while Plaintiffs were minors.

247. Cal. Civ. Code § 1708.5 prohibits any act with the intent to cause a harmful or offensive contact with an intimate part of another, and a sexually offensive contact with the person results, or any act that causes an imminent apprehension of such harmful or offensive contact and the offensive contact results.

248. Defendants knowingly conspired and/or aided and abetted to force Plaintiffs into sexual battery with Defendants, and such sexual battery did, on multiple occasions, occur.

249. Plaintiffs were minors minor when Defendants sexually battered them.

250. Each Defendant knowingly conspired and/or aided and abetted to create conditions of coercion and control that caused Plaintiffs to be repeatedly subjected to private, egregiously offensive sexual contact with Defendants, all in furtherance of



1 sexually battering Plaintiffs and in furtherance of the Abuse Enterprise.

2       251. The sexual battery of Plaintiffs by the Abuse Defendants was the result of  
3 Defendants' collective cover up, as statutorily defined by California Code of Civil  
4 Procedure § 340.1(b).

5       252. As a direct and proximate cause of Defendants' actions, Plaintiffs have  
6 suffered severe emotional and mental distress and anxiety, humiliation,  
7 embarrassment, and additional damages.

8       253. The aforementioned conduct was willful, wanton, and malicious. At all  
9 relevant times, Defendants acted with conscious disregard of Plaintiffs' rights and  
10 safety as a minor in their care. Defendants also acted with the knowledge of or with  
11 reckless disregard for the fact that their conduct was certain to cause injury and/or  
12 humiliation to Plaintiffs.

13       254. Plaintiffs are therefore entitled to recover treble the amount of damages  
14 they sustained, pursuant to California Code of Civil Procedure § 340.1(b)(1) in an  
15 amount to be proven at trial, attorneys' fees, and other relief that the Court may deem  
16 proper.

17                               **TENTH CLAIM FOR RELIEF**  
18                               **Gender Violence in Violation of Cal. Civ. Code § 52.4**  
19                               *(Against Defendants and Does 1-100)*

20       255. Plaintiffs re-allege and incorporate by reference herein each and every  
21 allegation contained herein above as though fully set forth and brought in this cause of  
22 action.

23       256. Plaintiffs bring this claim for relief under Cal. Civ. Code Section 52.4,  
24 which prohibits acts of gender violence.

25       257. Plaintiffs bring this claim pursuant to California Assembly Bill 218,  
26 amending Sections 340.1 and 1002 of the California Code of Civil Procedure and  
27 Section 905 of the Government Code, relating to childhood sexual assault, reviving  
28 until December 31, 2023 the statute of limitations for all previously extinguished

1 claims for damages suffered as a result of childhood sexual assault for victims within  
2 22 years of the age of majority.

3 258. As alleged herein, Plaintiffs were the victims of multiple instances of  
4 sexual battery as a minor perpetrated by Defendants and facilitated by all Defendants  
5 herein. Defendants subjected Plaintiffs to these multiple incidents of sexual battery at  
6 the hands of Defendants while Plaintiffs were minors.

7 259. Cal. Civ. Code § 52.4 prohibits commission of acts of gender violence,  
8 defined to include a physical intrusion or physical invasion of a sexual nature under  
9 coercive conditions, whether or not those acts have resulted in criminal complaints,  
10 charges, prosecution, or conviction.

11 260. As alleged herein, Plaintiffs were repeatedly the victim of acts of gender  
12 violence by Defendants while they were minors.

13 261. Each Defendant herein knowingly conspired and/or aided and abetted to  
14 create conditions of coercion and control that caused Plaintiffs to be repeatedly  
15 subjected to private, egregiously offensive sexual contact with Defendants, all in  
16 furtherance of committing acts of gender violence against Plaintiffs.

17 262. The repeated sexual battery of Plaintiffs by Defendants was the result of  
18 Defendants' collective cover up, as statutorily defined by California Code of Civil  
19 Procedure § 340.1(b).

20 263. As a direct and proximate cause of Defendants' actions, Plaintiffs have  
21 suffered severe emotional and mental distress and anxiety, humiliation,  
22 embarrassment, and additional damages.

23 264. The aforementioned conduct was willful, wanton, and malicious. At all  
24 relevant times, Defendants acted with conscious disregard of Plaintiffs' rights and  
25 safety as a minor in their care. Defendants also acted with the knowledge of or with  
26 reckless disregard for the fact that their conduct was certain to cause injury and/or  
27 humiliation to Plaintiffs.

28 ///

265. Plaintiffs are therefore entitled to recover treble the amount of damages they sustained, pursuant to California Code of Civil Procedure § 340.1(b)(1) in an amount to be proven at trial, attorneys' fees and other relief that the Court may deem proper.

## PRAYER FOR RELIEF

Plaintiffs respectfully demand a trial by jury on all claims so triable.